

COUNTY OF COOK)
)
STATE OF ILLINOIS)

UNDER SEAL

SS

AFFIDAVIT

Terrance Looney, being duly sworn, deposes and states as follows:

1. I am a Chicago Police Officer currently assigned to the HIDTA/DEA Task Force, United States Department of Justice. I have been so employed by Chicago Police Department ("CPD") for approximately 13 years. I am currently assigned to the Drug Enforcement Administration as a Task Force Officer. In connection with my official Drug Enforcement Administration ("DEA") duties, I investigate criminal violations of the federal narcotics laws, including but not limited to, Title 21, United States Code, and Sections 841, 843, and 846. I have also been involved in various types of electronic surveillance, and in the debriefing of defendants, witnesses, informants, and others who have knowledge of narcotics trafficking, and of the laundering and concealing of proceeds of drug trafficking defendants for the past year. I have received specialized training in the enforcement of laws concerning the activities of narcotics traffickers. I am currently assigned to the Chicago Field Division. My current assignment involves investigations of narcotics distribution by street gangs within the Chicago area. Prior to being assigned to the DEA/HIDTA Task Force, I was assigned to a narcotics team conducting mainly long-term narcotic investigations for approximately 8 years.

2. I am familiar with and have participated in all of the normal methods of investigation including but not limited to, visual surveillance, the general questioning of witnesses, the use of informants, the use of pen registers and undercover operations. Based

on my training and experience, I am familiar with the ways in which drug dealers and gang members conduct their drug-related business, including, but not limited to their methods of distributing narcotics; use of telephone communication devices; use of numerical codes and code words to identify themselves, the nature of the communication, drug quantities, and to conduct their drug-related business; and common practices of registering and obtaining communication devices under false names, or names of relatives and/or friends to avoid financial responsibilities and tracking of criminal activities by law enforcement entities.

3. On the basis of the information contained in this Affidavit, and my training and experience, I allege that there is probable cause to believe that between January 2007, and September 19, 2007, the defendants listed below conspired with each other, and with others, to knowingly and intentionally possess with the intent to distribute a controlled substance, namely, mixtures containing in excess of one kilogram heroin, a Schedule I Narcotic Drug Controlled substance, in violation of Title 21, United States Code, Sections 846 and 2. The following are the individuals charged in this Criminal Complaint:

- a. AUKEY WILLIAMS, a/k/a "Key"
- b. MARIO REEVES, a/k/a "Rio"
- c. MAURICE WILLIAMS, a/k/a "Reece"
- d. JONTALLE BOOKER, a/k/a "JT"
- e. MARSHAWN WRIGHT
- f. JAVON SMITH
- g. DOMINIQUE WHITE
- h. KENNETH HARRIS, a/k/a "Santa Claus"
- i. VINCE GATHINGS
- j. TAVARIS WILLIAMS, a/k/a "Nuke"
- k. LINDELL BLOUNT, a/k/a "Lockjaw"
- l. NICOLE BOZEMAN, a/k/a "Nikki"
- m. LARRY JOHNSON, a/k/a "Laro"

n. TOM BROWN, a/k/a "T-Bone," a/k/a "Tone"

4. This case is being investigated by myself, agents of the DEA, CPD officers, and Cook County Sheriff's Police Department officers. The statements contained in this Affidavit are based in part on: (a) my personal participation in this investigation; (b) information provided by Special Agents of the DEA, officers of the CPD, intelligence analysts of the DEA and CPD, and other law enforcement agents; (c) information provided by cooperating sources; (d) analysis of pen register and trap and trace data; (e) review of consensually-recorded conversations and conversations recorded pursuant to court authorization; (f) the training and experience of myself and other law enforcement agents, and (g) my review of laboratory analysis reports, intelligence reports of telephone records, pen register and trap and trace analyses, and criminal history records maintained by CPD, Illinois State Police, and the National Crime Information Center.

5. Because this Affidavit is submitted for the limited purpose of establishing probable cause to support the Criminal Complaint and the issuance of arrest warrants against the proposed defendants, it contains only a summary of relevant facts. I have not included each and every fact known to me concerning the entities, individuals, and events described in this Affidavit.

6. Officers, agents, and I have listened to conversations intercepted over the target phones listed below, and have attempted to transcribe them accurately. Additionally, the voice identifications for the calls set out below are based on the information identified. In most cases, voice identifications are based on names used during the intercepted

conversations, voice recognition that has been accomplished to date by law enforcement officers, historical information developed during this investigation, and/or telephone subscriber information. Based on my training and experience, the context and contents of the conversations, I have included explanations where appropriate to provide my understanding of these conversations, including my understanding of coded language and terms used by narcotics traffickers. To the extent that intercepted and recorded communications are summarized below, those summaries do not include references to all of the topics covered during the course of the conversation that was intercepted or recorded. In addition, the summaries do not include references to all statements made by the speakers on the topics that are described.

7. On the basis of the information contained in this Affidavit, my experience and training, and on the basis of other information which I have reviewed and determined to be reliable, I allege facts contained herein to show that: since approximately September 2006, agents of the DEA and Chicago Police Department (CPD) have been investigating AUKEY WILLIAMS, the “Poison” heroin line (“Poison Line”) and its drug-trafficking operations. The Poison Line operates principally in the area of 7900 South Cottage Grove on the south east side of Chicago, including but not limited to the 3rd, 4th, and 6th Chicago Police districts. AUKEY WILLIAMS controls a portion of the Poison Line in Chicago around the area of 7900 South Cottage Grove. “Poison” is the brand name used by this heroin distribution organization. In short, the investigation to date has revealed that AUKEY WILLIAMS and the other

defendants, as well as Individual A, Individual B, Individual C, and others have conspired to sell heroin in the general area of 7900 South Cottage Grove in Chicago.¹

8. The investigation to date has included surveillance, controlled purchases of narcotics, consensually-recorded conversations, and court-authorized interception of wire communications for the following telephones:

- a. (773) 567-5165, electronic serial number (“ESN”) 01904667711 (Target Phone 4), used by MAURICE WILILAMS, Individual B, and MARSHAWN WRIGHT, intercepted from May 1, 2007 through May 31, 2007;
- b. (312) 523-3159, ESN 1bcff933 (Target Phone 5), used by AUKEY WILLIAMS, intercepted during various periods from May 16, 2007 through May 31, 2007;
- c. (312) 519-1740, ESN 02703623614 (Target Phone 6), used by AUKEY WILLIAMS, intercepted from May 14, 2007 through May 31, 2007;
- d. (773) 310-9564, ESN 03412928029 (Target Phone 8), used by MAURICE WILLIAMS, intercepted from June 25, 2007 through July 24, 2007; and
- e. (773) 420-8589, ESN 02013151868 (Target Phone 9), used by Individual E, intercepted from July 11, 2007 through August 9, 2007.

9. The investigation has revealed that many individuals work for AUKEY WILLIAMS distributing Poison Line heroin. The Poison Line functions primarily by use of a “work phone” which is used to coordinate the distribution of the heroin to customers. The phone number of the work phone is known to the customers who call the work phone to order

¹ Unless otherwise noted, all of the events described in this affidavit occurred in Chicago, Illinois.

heroin. During these calls, the customer and the worker operating the work phone make arrangements to meet to conduct the heroin sale.

10. From January through March 2007, CPD undercover officers (“UCO” or “UCOs”) made controlled purchases of heroin by calling a work phone for the Poison Line (“Poison Work Phone 1”). In late March 2007, Poison Work Phone 1 was replaced as the work phone; Target Phone 4 became the new work phone, replacing Poison Work Phone 1. UCOs then made controlled purchases of heroin using Target Phone 4. In early June 2007, Target Phone 8 became the new work phone, replacing Target Phone 4. UCOs then made controlled purchases of heroin using Target Phone 8.

11. UCOs have been able to identify MARSHAWN WRIGHT, JONTALLE BOOKER, MAURICE WILLIAMS, LINDELL BLOUNT, JAVON SMITH, AUKEY WILLIAMS, and MARIO REEVES as persons who answered either Poison Work Phone 1, Target Phone 4, or Target Phone 8, and made the arrangements to sell heroin to the UCOs. As detailed below, on many separate occasions, several defendants including AUKEY WILLIAMS, MARSHAWN WRIGHT, JONTALLE BOOKER, MAURICE WILLIAMS, MARIO REEVES, DOMINIQUE WHITE, JAVON SMITH, Individual F, and LINDELL BLOUNT have been directly involved in delivering heroin to UCOs.

12. The Poison Line operates with a day shift and a night shift consisting of 3 to 4 workers per shift, selling heroin to hundreds of customers daily. The Poison Line has many regular customers and typically operates in an area approximately bounded by 71st Street to 87th Street, and from State Street to Stoney Island in Chicago. Typically a customer calls the Poison Line and places

an order for a certain number of bags of heroin, with a price of \$10 per bag. A \$10 bag typically contains approximately .2 gram of heroin. The individual working the phone directs the customer to meet the worker at a specific location, typically on the street, to complete the transaction. When the workers have sold all of the heroin in their possession, a worker calls one of the individuals responsible for the re-supply of heroin. The worker then meets with the individual responsible for re-supply in order to give that person the proceeds from the prior sales and to obtain additional bags of heroin. After the worker has been supplied with more heroin, the worker resumes taking orders and setting up meeting locations to complete heroin transactions with customers. This cycle continued routinely, and on a daily basis.

13. The following is a summary of the roles played by the charged individuals, as well as citations to the paragraphs in this affidavit that refer to the particular individual:

a. **AUKEY WILLIAMS a/k/a “KEY”** headed the daily operations of the Poison Line by routinely checking up on workers, made sure the workers were supplied with sufficient quantities of heroin, collected the proceeds from the sales of heroin for each shift, and occasionally sold the heroin himself. WILLIAMS also oversaw the “cutting” of the heroin to insure the quality of the drugs sold on the Poison Line. In addition WILLIAMS enforced the collection of proceeds of Poison Line heroin sales by demanding workers return the proper amount of proceeds quickly. AUKEY WILLIAMS was also in charge of purchasing the raw heroin from a source of supply. AUKEY WILLIAMS is referred to in paragraphs 4-19, 21-23, 36, 51, 53-55, 57, 60-64, 69, 71-75, 77-78, 81-85, 93, 102, 107-108,

111-112, 118-119, 121, 125-126, 132-133, 135-139, 144-151, 156-158, 160-162, and 164-165.

b. **MARIO REEVES a/k/a “RIO”** helped AUKEY WILLIAMS oversee the workers to ensure they are on the street selling heroin, and to keep them supplied with sufficient quantities of heroin to sell. REEVES also assisted with the collection of proceeds from the Poison Line. MARIO REEVES is referred to in paragraphs 36, 43, 47, 48, 57, 79, 86, 110, 120, 125, 126, 129, 130, 132, 133, 134, 136, 139, 140, 141, 142, 143, and 151.

c. **MAURICE WILLIAMS a/k/a “REECE”** regularly sold Poison Line heroin by taking heroin orders from customers then meeting the customers to sell the heroin and collect their money. MAURICE WILLIAMS is referred to in paragraphs 8, 11, 14, 21-22, 24-25, 28-32, 34-40, 43-48, 51-52, 57-60, 65, 67-71, 76, 78-79, 103, 109, 112-116, 120-121, 123-126, 128, 133, 152-155, 158-160, 162-163, and 166.

d. **JONTALLE BOOKER a/k/a “JT”** distributed heroin to customers calling into the Poison Line by answering calls taking orders for heroin and delivering the heroin to the customer placing the order. For certain periods of time, JONTALLE BOOKER handled the majority of the calls into the Poison Line work phone. JONTALLE BOOKER is referred to in paragraphs 11, 13, 29, 49-50, 52, 77, 80, 87-90, 92-93, 107-114, 121, 122, 127-135, 137-138, 140-143, 146, and 150-151.

e. **MARSHAWN WRIGHT** distributed heroin to customers calling into the Poison Line. MARSHAWN WRIGHT is referred to in paragraphs 8, 11, 14, 21, 22, 26, 27, 33, 41, 43, 46, and 63.

f. **JAVON SMITH** distributed heroin to customers calling into the Poison Line. JAVON SMITH is referred to in paragraphs 11, 13, 22, 32, 36, 37, 40, 41, 44-46, and 63.

g. **DOMINIQUE WHITE** distributed heroin to customers calling into the Poison Line and acts as a “lookout” on occasion. DOMINIQUE WHITE is referred to in paragraphs 11, 13, 22, 29, 30, 39, 41, 44, 152-155, and 162-163.

h. **KENNETH HARRIS a/k/a “SANTA CLAUS”** occasionally distributed heroin to customers calling into the Poison Line but acts mainly as a “point man” by gathering groups of customers, collecting their money, calling the work phone to place an order, and advising the worker using the work phone where the customers are located. HARRIS directed the customers where to meet the worker in order to pick up their heroin. KENNETH HARRIS is referred to in paragraphs 13, 56-57, 66, 88-93, and 98-100.

i. **VINCE GATHINGS** distributed heroin to customers calling into the Poison Line and occasionally operated the work phone. VINCE GATHINGS is referred to in paragraphs 13, 55, 57, 64-66, 68, 70, 102-103, 106, 117, 159, and 161.

j. **LINDELL BLOUNT a/k/a “LOCKJAW”** distributed heroin to customers calling into the Poison Line. LINDELL BLOUNT is referred to in paragraphs 11, 13, 53, 54, 56, 57, 64-66, 104, and 105.

k. **NICOLE BOZEMON a/k/a “NIKKI”** distributed heroin to customers calling into the Poison Line and also supplied the operation with rental vehicles. NICOLE BOZEMAN is referred to in paragraphs 13, 57, 68, 70, 94-101, 117, and 157-161.

l. **TAVARIS WILLIAMS a/k/a “NUKE”** distributed heroin to customers calling into the Poison Line. TAVARIS WILLIAMS is referred to in paragraphs 13, 57, 64, 68, 115-119, and 144-145.

m. **LARRY JOHNSON a/k/a “LARO”** distributed heroin to customers for the Poison Line and headed the distribution of heroin in the area of 6500 S Cottage. LARRY JOHNSON is referred to in paragraphs 13, 57, 108, 120-124, 132, 139, 148, and 149.

n. **TOM BROWN a/k/a “T-BONE” or “TONE”**) is a close associate of AUKEY WILLIAMS. TOM BROWN resides at a condominium owned by AUKEY WILLIAMS at 4720 South Martin Luther King Drive in Chicago. TOM BROWN sold heroin for AUKEY WILLIAMS and also helped AUKEY WILLIAMS store heroin at the condominium at 4720 South King Drive. TOM BROWN is referred to in paragraphs 13, 60, 61, 72, 74, 75, and 164-165.

I. Confidential Source Information Regarding Operation of the Poison Line.

A. Confidential Source-1

14. In December 2006, CPD officers arrested and charged an individual (hereinafter “CS-1”) with possession of a controlled substance. At the time of his/her arrest CS-1 had approximately 5 bags (approximately 1 gram) of heroin in the area of 7900 South Cottage Grove. After agreeing to cooperate with law enforcement, CS-1 stated that he/she sold narcotics for AUKEY WILLIAMS, and eventually CS-1 also began collecting money from other sellers for WILLIAMS. CS-1 stated that he/she worked for AUKEY WILLIAMS

for four months prior to CS-1's arrest in December 2006. CS-1 stated that AUKEY WILLIAMS routinely dropped off the “work”(narcotics) early every morning at the 7900 block of South Champlain, usually driving a Chrysler 300C (hereinafter “Chrysler 300 C”). CS-1 also stated that AUKEY WILLIAMS usually returned to re-supply the “workers”(sellers of narcotics) as needed throughout the day.

15. CS-1 provided information about AUKEY WILLIAMS to law enforcement with the expectation that he/she would receive a benefit from the Cook County State’s Attorney’s Office in relation to a pending case based on his December 2006 arrest described above. CS-1 has the following felony convictions: possession of a controlled substance in 1996; possession of a controlled substance in 1996; and Carry/Possession of a firearm in 1998. CS-1’s criminal history also reflects 18 different arrests, eleven for felony offenses.

16. Independent surveillance of AUKEY WILLIAMS by DEA agents and CPD officers corroborated information provided by CS-1. For example, in December 2006, and January 2007, agents observed AUKEY WILLIAMS on several occasions circling the area of 7900 South Champlain and Cottage Grove in the Chrysler 300C , or a BMW 740li, picking up workers who appear to be selling drugs for AUKEY WILLIAMS, driving for a block or two, and then dropping off the workers at a another location within a couple blocks of where AUKEY WILLIAMS picked up the worker. Agents and officers observed AUKEY WILLIAMS engaging in these types of movements at various hours of the day and night.

17. According to CS-1, at the time of his/her arrest CS-1 was responsible for both

selling narcotics and collecting money from other sellers for AUKEY WILLIAMS. CS-1 stated that he/she would collect the money and give it directly to AUKEY WILLIAMS at the end of a shift. CS-1 also stated, as a seller for AUKEY WILLIAMS, he/she sold approximately 15-18 packs a day, each pack containing 25 bags of heroin, with each bag containing approximately .5 grams of heroin.

B. AUKEY WILLIAMS's Worker

18. CPD officers have arrested another individual who stated he/she works for AUKEY WILLIAMS selling heroin in the area of 7900 South Cottage Grove.

19. On November 12, 2006, CPD officers observed a person ("Worker 2") shout out to passing vehicles and pedestrians, "Got blows, blows for sale." (In my experience and the experience of other DEA agents and CPD officers, the term "blows" refers to heroin.) Officers also observed Worker 2 make several hand-to-hand transactions with several individuals over a 45 minute period, both on the street and in "Billy's Gyros" at 7855 South Cottage Grove. CPD officers arrested Worker 2 and a custodial search of Worker 2 revealed 23 zip lock bags which tested positive for the presence of approximately 6 grams of heroin at the Illinois State Police Division of Forensic Sciences. Worker 2 provided information about AUKEY WILLIAMS to law enforcement with the expectation that he/she would receive a benefit from the Cook County State's Attorney's Office in relation to charges stemming from this arrest. Worker 2 was convicted of possession of less than 15 grams of cocaine in 2002, and sentenced to 2 years of probation, and was convicted of theft of property in 1999, and sentenced to two days in jail. Worker 2 was interviewed and stated

he/she was a “main worker” for AUKEY WILLIAMS in charge of re-supplying the workers in the area of 7900 South Cottage Grove with additional heroin. Worker 2 also stated that he/she was often in charge of the “work phone,” which he/she identified as 773-981-6334 (the number for Poison Work Phone 1). Worker 2 stated that Poison Work Phone 1 was used by workers to keep in contact with AUKEY WILLIAMS and handle orders from prospective customers.

II. Undercover Heroin Purchases Via the Poison Work Phone.

20. CPD UCOs made numerous controlled heroin buys by placing calls into Poison Work Phone 1, Target Phone 4, and Target Phone 8, requesting an amount of heroin, and subsequently meeting at a location as instructed by the person answering the work phone to complete the transaction.

A. Controlled Purchases using Poison Work Phone 1.

21. Before March 29, 2007, the activation date of Target Phone 4, a cellular phone assigned the number (773) 981-6334 was used as the Poison Line work phone (“Poison Work Phone 1”). Poison Work Phone 1 was activated on December 24, 2006, and was used by AUKEY WILLIAMS, MAURICE WILLIAMS, MARSHAWN WRIGHT, and others. A pen register was activated on Poison Work Phone 1 on February 23, 2007, revealing an extremely high volume of calls and also corroborating narcotics purchases made by UCOs after placing calls into Poison Work Phone 1.

22. As set forth below, from January 25, 2007, to March 16, 2007, UCOs conducted 17 controlled heroin buys using Poison Work Phone 1 totaling approximately 26.6

grams of heroin. The following defendants sold heroin to the UCOs after calls were placed into Poison Work Phone 1: AUKEY WILLIAMS, MAURICE WILLIAMS, JAVON SMITH, MARSHAWN WRIGHT, Individual F and DOMINIQUE WHITE.²

23. On January 25, 2007, a UCO called Poison Work Phone 1 and a male answered, and asked the UCO “Who is this?” UCO replied “This is Pete I’m at 79th and Cottage, where you at?” the person using the work phone replied “Meet at 77th and Evans.” The UCO arrived and parked at 7745 South Evans. The UCO then made a second phone call to the same number and the male stated to the UCO “I’ll be right there.” A short time later a grey Ford Taurus bearing Minnesota license plate URT460, arrived and parked behind the Undercover Vehicle (“UCV”). The UCO then exited the UCV and approached the drivers’ side of the Ford Taurus and observed a male wearing a gray sweatshirt and blue jeans, now known as AUKEY WILLIAMS.³ AUKEY WILLIAMS asked the UCO “How many?” The

² During the course of this investigation, when UCOs purchased narcotics from a person or persons they did not recognize, other CPD officers would conduct traffic stops of the individual(s) shortly after the purchase and request the individuals to produce some form of identification. The UCOs would run the name provided by the individual(s) through the CPD criminal history database and review the arrest photograph associated with the name to confirm that the name provided corresponded to a database photograph of the person the UCOs had met to purchase narcotics.

³ AUKEY WILLIAMS was identified in a photographic lineup after the controlled purchase of heroin on January 25, 2007 by the UCO who made the controlled purchase of narcotics from AUKEY WILLIAMS earlier that day. The voice identification of AUKEY WILLIAMS is based in part on the use of the name “Aukey” during several calls on target phones in this investigation. The voice identification of AUKEY WILLIAMS is also based on the content of the calls on Target Phone 5. Further, on May 3, 2007, utilizing a tracking device which had been installed pursuant to a court order on AUKEY WILLIAMS’s vehicle, a 2003 BMW 745li, surveillance was established by CPD officers in the area of 95th Street and Cottage Grove Avenue. At approximately 9:35 a.m., surveillance officers advised the CPD officer that they could observe AUKEY WILLIAMS and the officer placed a short “wrong number” call to Target Phone 5. A few seconds after the officer advised surveillance officers that he was placing the call, a surveillance officer observed AUKEY

UCO replied “Four.” An unknown male (UM) wearing a brown coat and white t-shirt, was seated on the passenger’s side of the vehicle. The UCO observed the unknown male counting out and handing to AUKEY WILLIAMS four black and white tinted zip lock plastic bag, marked with an “X” inside a circle, each containing approximately .2 grams of heroin. AUKEY WILLIAMS handed the UCO the same four bags he received from the UM. The UCO then handed \$40 to AUKEY WILLIAMS. The substance in these bags tested positive for the presence of approximately .8 grams of heroin at the Illinois State Police Division of Forensic Sciences.

24. On January 26, 2007, a UCO called Poison Work Phone 1 to arrange the purchase of heroin. The person who answered Poison Work Phone 1, told the UCO to go to the intersection of 77th and Evans. The UCO proceeded to 7739 South Evans. After he/she arrived at the location, the UCO made a second phone call to Poison Work Phone 1 and the male said, “I’m right here.” A person now known as MAURICE WILLIAMS⁴ drove up and the UCO got out of his/her vehicle and met with WILLIAMS. WILLIAMS asked, “How many?” The UCO replied, “I need four.” Individual A, who was in the passenger seat of the

WILLIAMS pick up his cellular phone and talk very briefly. On May 3, 2007, following the recorded phone calls to AUKEY WILLIAMS, the CPD Officer who called Target Phone 5 listened to intercepted phone calls between Target Phone 4 and Target Phone 5 and verified that the person he spoke to on two occasions over Target Phone 5 was the same person using Target Phone 5 in calls intercepted over Target Phone 4. In addition, officers conducted a field interview of AUKEY WILLIAMS on July 31, 2007, and recognized his voice as the voice preliminarily attributed to AUKEY WILLIAMS based on the information set forth above.

⁴ MAURICE WILLIAMS was identified on January 26, 2007, in a photographic lineup by the UCO who made a controlled purchase of narcotics from him that day.

car driven by WILLIAMS counted out four bags and handed them to WILLIAMS, who gave them to the UCO. The UCO gave MAURICE WILLIAMS \$40 in United States currency and MAURICE WILLIAMS gave the UCO four bags of heroin which tested positive for the presence of approximately .8 grams of heroin at the Illinois State Police Division of Forensic Sciences.

25. On February 01, 2007, a UCO called Poison Work Phone 1 to arrange the purchase of heroin. The person who answered Poison Work Phone 1, told the UCO to go to the block of 7800 South Cottage Grove to purchase the heroin. The UCO proceeded to 7851 South Cottage Grove. After he/she arrived at the location, the UCO met MAURICE WILLIAMS. The UCO gave MAURICE WILLIAMS \$10 in United States currency and MAURICE WILLIAMS gave the UCO one bag of heroin which tested positive for the presence of approximately .2 grams of heroin at the Illinois State Police Division of Forensic Sciences.

26. On February 02, 2007, a UCO called Poison Work Phone 1 to arrange the purchase of heroin. The person who answered Poison Work Phone 1, told the UCO to go to the block of 8000 South Evans to purchase the heroin. The UCO proceeded to 8042 South Evans. After he/she arrived at the location, the UCO met MARSHAWN WRIGHT.⁵ The UCO gave MARSHAWN WRIGHT \$50 in United States currency and MARSHAWN WRIGHT gave the UCO five bags of heroin which tested positive for the presence of

⁵ MARSHAWN WRIGHT was identified on February 2, 2007, in a photographic lineup by the UCO who made a controlled purchase of narcotics from him that day.

approximately 1 gram of heroin at the Illinois State Police Division of Forensic Sciences.

27. On February 02, 2007, a UCO called Poison Work Phone 1 to arrange the purchase of heroin. The person who answered Poison Work Phone 1, asked the UCO, "You need 10?" The UCO replied, "Yeah like right now," and the person answering Poison Work Phone 1 said, "Meet me on 79th and Evans and I'll be right there." The UCO proceeded to 7943 South Evans. After he/she arrived at the location, the UCO met MARSHAWN WRIGHT. The UCO gave MARSHAWN WRIGHT \$100 in United States currency and MARSHAWN WRIGHT gave the UCO 10 bags of heroin which tested positive for the presence of approximately 2.2 grams of heroin at the Illinois State Police Division of Forensic Sciences.

28. On February 03, 2007, a UCO called Poison Work Phone 1 to arrange the purchase of heroin. The person who answered Poison Work Phone 1, told the UCO to go to the block of 7700 South Maryland to purchase the heroin. The UCO proceeded to 7705 South Maryland. After he/she arrived at the location, the UCO met MAURICE WILLIAMS. The UCO gave MAURICE WILLIAMS \$50 in United States currency and MAURICE WILLIAMS gave the UCO five bags of heroin which tested positive for the presence of approximately 1.1 grams of heroin at the Illinois State Police Division of Forensic Sciences.

29. On February 8, 2007, a UCO placed a call into Poison Work Phone 1 and MAURICE WILLIAMS answered,⁶ and asked the UCO "Who is this?" The UCO replied

⁶ On February 8, 2007, a UCO called Poison Work Phone 1 to arrange the purchase of heroin. The UCO recognized the voice of the person who answered Poison Work Phone 1 as

“This is Pete I’m at 67th and Cottage, where you at?” MAURICE WILLIAMS said, “Meet at 74th and Evans in the middle of the block.” A short time later the UCO parked a UCV at 7420 South Evans. The UCO made a second phone call to the same number and MAURICE WILLIAMS stated to the UCO, “I’m right there.” A short time later a grey Ford Taurus, bearing Minnesota license plate URT460, driven by MAURICE WILLIAMS, arrived at that location. The Ford parked directly behind UCV. The UCO got out of the UCV, approached the driver’s side of the Ford and got in the rear seat. MAURICE WILLIAMS asked the UCO “How many?” The UCO replied “I need six.” DOMINIQUE WHITE, seated on the passenger’s side of the vehicle, held her hand out and received \$60 in United States currency from the UCO.⁷ MAURICE WILLIAMS gave the UCO six clear zip lock plastic bags, with yellow tint and a black batman logo on one side, which later tested positive for the presence of approximately 1 gram of heroin at the Illinois State Police Division of Forensic Sciences.

30. On February 9, 2007, a UCO placed a call into Poison Work Phone 1 and MAURICE WILLIAMS answered, and asked the UCO “Who is this?” The UCO replied

MAURICE WILLIAMS based on the prior purchase of narcotics from MAURICE WILLIAMS by that UCO on January 26, 2007.

⁷ DOMINIQUE WHITE was identified on February 8, 2007, in a photographic lineup by the UCO who made a controlled purchase of narcotics that day. The voice identification of DOMINIQUE WHITE is based on, among other things, the following: on May 4, 2007 at 8:32 AM, DOMINIQUE WHITE called JONTALLE BOOKER, who is using Target Phone 4. During this call BOOKER asked, “Who is this?” WHITE answered, “It’s Dominique.” In addition, the telephone DOMINIQUE WHITE used in call, 773-567-2565, was subscribed to DOMINIQUE WHITE, 7801 South Rhodes Avenue, Chicago, Illinois. At the time of three of her six arrests, WHITE listed her place of residence as 7801 South Rhodes Avenue, Chicago, Illinois.

“This is Pete I’m at 67th and Cottage, where you at?” MAURICE WILLIAMS replied, “Meet at 82nd and Woodlawn.” A short time later, the UCO parked a UCV at 8231 South Woodlawn, and made a second phone call to Poison Work Phone 1. MAURICE WILLIAMS answered and the UCO said, “I’m right there.” A short time later a grey Ford Taurus bearing Minnesota license plate URT460, driven by MAURICE WILLIAMS arrived at that location. The Ford parked directly behind UCO’s Undercover Vehicle (UCV). The UCO exited the UCV and approached the passenger’s side of the Ford and entered the rear seat. MAURICE WILLIAMS asked the UCO, “How many?” The UCO replied, “I need four.” MAURICE WILLIAMS gave the UCO four clear zip lock plastic bags, with yellow tint and black batman logo on one side, which tested positive for the presence of approximately .5 grams of heroin at the Illinois State Police Division of Forensic Sciences. The UCO handed \$40 in United States currency to DOMINIQUE WHITE, who was seated on the passenger’s side of the vehicle.

31. On February 16, 2007, a UCO called Poison Work Phone 1 to arrange the purchase of heroin. The UCO recognized the voice of the person who answered Poison Work Phone 1 as MAURICE WILLIAMS. The UCO identified himself by his undercover name and MAURICE WILLIAMS asked the UCO where he was. The UCO stated that he was on 79th Street and asked MAURICE WILLIAMS “Where you at?” MAURICE WILLIAMS said, “Call me you get on 79th and King Drive.” The UCO proceeded to 7858 South Martin Luther King Drive and observed MAURICE WILLIAMS. After he/she arrived at the location, the UCO met MAURICE WILLIAMS and Individual B. The UCO gave

MAURICE WILLIAMS \$30 in United States currency and MAURICE WILLIAMS gave the UCO three bags of heroin which tested positive for the presence of approximately .6 grams of heroin at the Illinois State Police Division of Forensic Sciences.

32. On February 23, 2007, at approximately 3:48 p.m., a UCO called Poison Work Phone 1 to arrange the purchase of heroin. The UCO recognized the voice of the person who answered Poison Work Phone 1 as MAURICE WILLIAMS. The UCO identified himself by his undercover name and MAURICE WILLIAMS asked the UCO where he was. UCO stated that he was going to be on 79th Street in five minutes. MAURICE WILLIAMS told the UCO to call when UCO arrived at “79th and King Drive.” UCO responded, “You want me to meet you at that gas station?” WILLIAMS responded, “Yeah.” The UCO proceeded to a gas station at 534 East 78th Street. After he/she arrived at the location, the UCO spoke directly to MAURICE WILLIAMS and WILLIAMS asked UCO, “How many you need?” The UCO said, “I need ten.” MAURICE WILLIAMS responded, “I don’t have that on me?” JAVON SMITH then said to the UCO, “Follow me to Rhodes.”⁸ The UCO followed SMITH to 7801 South Rhodes. At that location MAURICE WILLIAMS got in the UCV and counted out and gave the UCO 11 clear Ziplock bags. The UCO gave MAURICE WILLIAMS \$100 in United States currency. The eleven bags the UCO purchased tested positive for the

⁸ JAVON SMITH was identified on February 23, 2007, in a photographic lineup by the UCO who made the controlled purchase of narcotics from SMITH and MAURICE WILLIAMS that day.

presence of approximately 2.4 grams of heroin at the Illinois State Police Division of Forensic Sciences.

33. On February 23, 2007, at approximately 6:16 p.m., a UCO placed a call to Poison Work Phone 1 and spoke to a person now known as MARSHAWN WRIGHT. Following that call, the UCO drove a UCV to the McDonald's parking lot at 7904 South King Drive. A short time later MARSHAWN WRIGHT arrived in a grey Ford Taurus. The UCO got out of the UCV, walked up to the Taurus and asked, "What's up how you feeling?" WRIGHT asked, "How many you want?" The UCO replied, "Five." WRIGHT said, "I only got three on me unless you want to follow me." The UCO said, "Give me them three." WRIGHT stated, "You can call me back." UCO asked, "How long?" WRIGHT replied, "Ten minutes." During this meeting, the UCO handed WRIGHT \$30 and WRIGHT gave the UCO three bags containing a total of approximately .6 grams of a substance which tested positive for heroin according to the Illinois State Police Division of Forensic Sciences.

34. On March 06, 2007, the UCO called Poison Work Phone 1 to arrange the purchase of heroin. The UCO recognized the voice of the person who answered Poison Work Phone 1 as MAURICE WILLIAMS. MAURICE WILLIAMS told the UCO "you gotta call me when you get on 75th and Wentworth though." UCO said "remember I'm spending 200 with you this time." WILLIAMS responded "yeah" and UCO said "you got that ready?" WILLIAMS said "oh you want me to get you another two? Yeah I got it ready for you." In a subsequent call, which was not recorded, the UCO and MAURICE WILLIAMS agreed to meet at a bus stop near 159 West 75th Street to purchase the heroin.

The UCO proceeded to the bus stop near 159 West 75th Street. The UCO gave MAURICE WILLIAMS \$200 in United States currency and MAURICE WILLIAMS gave the UCO 22 clear ziplock bags with a Superman logo on one side, the contents of which tested positive for the presence of approximately 4.4 grams of heroin at the Illinois State Police Division of Forensic Sciences.

35. On March 7, 2007, at approximately 10:52 a.m., a UCO placed a call to Poison Work Phone 1 to make arrangements for a purchase of heroin. The UCO said, "I'm trying to get ten of them if you got it." MAURICE WILLIAMS asked, "How many?" The UCO said, "Ten. I'm going down south." MAURICE WILLIAMS responded, "Meet me at 75th and State." Moments later, near 75th and State Street in Chicago, MAURICE WILLIAMS met the UCO and asked, "Is that \$100.00?" The UCO replied, "Yep, yep count it up we good." MAURICE WILLIAMS said, "Ya." The UCO walked to the passenger side of blue Charger and MAURICE WILLIAMS handed the UCO ten small plastic ziplock bags with a superman logo on them. The UCO handed MAURICE WILLIAMS \$100 in United States currency. The UCO then returned to the UCV and drove away. The contents of the 10 bags of heroin MAURICE WILLIAMS gave to the UCO tested positive for approximately 2.2 grams of heroin at the Illinois State Police Division of Forensic Sciences.

36. Subsequent to the purchase in the previous paragraph, and after observing several narcotic transactions between occupants of the Charger and pedestrians, officers stopped the blue Charger. AUKEY WILLIAMS, MARIO REEVES, JAVON SMITH and MAURICE WILLIAMS were occupants in the vehicle, with MARIO REEVES as the

driver.⁹ The stop also revealed AUKEY WILLIAMS to be in possession of pre-recorded CPD funds which had previously been used by a UCO to purchase narcotics from MAURICE WILLIAMS on March 7, 2007. Specifically, CPD officers found a \$10 bill, bearing United States currency serial number BE02500264B, in AUKEY WILLIAMS's possession. JAVON SMITH was also found to be in possession of pre-recorded CPD funds used by the UCO, specifically, three \$20 bills, bearing United States currency serial numbers EB58813607J, EG551337156C and CG81589944B, which were commingled with other currency in SMITH's possession.

37. On March 9, 2007 a UCO placed a call into Poison Work Phone 1 and MAURICE WILLIAMS answered, and asked the UCO "Who is this?" The UCO replied "This is Pete. Where you at?" MAURICE WILLIAMS instructed the UCO to go to 79th and Martin Luther King Drive. A short time later the UCO parked a UCV at 7955 South King and made a second phone call to Poison Work Phone 1. MAURICE WILLIAMS answered again and instructed the UCO to meet him at 75th and State Street. The UCO relocated to 7455 South State and made a third call to Poison Work Phone 1. A short time later, a burgundy Oldsmobile, bearing temporary license plate 453H740, driven by Individual F,

⁹ MARIO REEVES was identified during this stop after producing a state identification card. The voice identification of REEVES was determined as follows: on or about April 20, 2007, CPD officers conducted a traffic stop of REEVES. REEVES provided a state identification card bearing his photograph and his name. Based on the officer's conversation with REEVES during that stop, the officer was able to identify the voice of REEVES as the same person using (773) 824-9998 in recorded calls intercepted over Target Phone 4 during May 2007. In addition, MARIO REEVES was identified by the name "Rio" during calls in which he was intercepted.

arrived at that location and parked along side of the UCV.¹⁰ Individual F signaled, by waving his hand in the UCO's direction, for the UCO to follow him. The UCO then followed the burgundy Oldsmobile to 7445 South Perry, where it parked. The UCO parked the UCV directly behind the Oldsmobile, at 7447 South Perry. MAURICE WILLIAMS got out of the passenger's side of the Oldsmobile, approached the driver's side of the UCV. MAURICE WILLIAMS walked west down the alley. A short time later MAURICE WILLIAMS returned, approached the passenger side of the UCV, and got inside. WILLIAMS counted out and gave the UCO 20 clear zip lock plastic bags, with red superman logos on one side. Collectively the 20 bags tested positive for the presence of approximately 4.1 grams of heroin at the Illinois State Police Division of Forensic Sciences. In exchange for the 20 bags, the UCO gave MAURICE WILLIAMS \$200 in United States currency.

38. On March 9, 2007, a UCO placed a call into Poison Work Phone 1 to arrange a to purchase heroin. During this call, MAURICE WILLIAMS asked, "Who's this?" The UCO answered, "This Steve where you at?" MAURICE WILLIAMS asked, "Where you at?" The UCO replied, "I'll be at 79th and King in about 20 minutes." MAURICE WILLIAMS asked, "You in a car?" The UCO answered, "Ya I'm in a green truck."

¹⁰ Individual F was identified on March 9, 2007, in a photographic lineup by the UCO who made the controlled purchase of narcotics from Individual F and MAURICE WILLIAMS that day. The voice identification of Individual F, is based on the following: The UCO had heard other defendants refer to Individual F by his nickname during controlled purchases of narcotics and heard Individual F's voice during the two controlled purchases on March 9, 2007. The UCO who purchased 20 bags of heroin from Individual F and WILLIAMS on March 9, 2007, listened to two calls (call 1435 on Target Phone 5 and call 51023 on Target Phone 4) and determined that the individual speaking on those calls was Individual F.

MAURICE WILLIAMS said, "Call me when you get to 75th and State." The UCO said, "75th and State alright I'm going to bring a \$100 bill with me." MAURICE WILLIAMS said, "Alright." The UCO drove to a Shell Gas Station at 75th Street and State Street and parked the UCV. The UCO made a second phone call to Poison Work Phone 1. A short time later, a burgundy four door Oldsmobile, bearing Illinois temporary plate 453H740, driven by Individual F with MAURICE WILLIAMS as the passenger, parked next to the UCV. The UCO got out of the UCV and walked to the rear passenger side of the Oldsmobile and got inside. The UCO spoke to MAURICE WILLIAMS about purchasing heroin and MAURICE WILLIAMS told the UCO to follow him across the bridge. The UCO got back in the UCV and followed the Oldsmobile to 7445 South Perry where Individual F parked the Oldsmobile. MAURICE WILLIAMS got out of the Oldsmobile and walked west through the alley. MAURICE WILLIAMS returned a short time later and got in the UCV from the passenger side. The UCO handed MAURICE WILLIAMS \$100 in United States currency, and MAURICE WILLIAMS handed the UCO nine small plastic bags with a superman logo on them. The nine bags collectively tested positive for the presence of approximately 1.9 grams of heroin at the Illinois State Police Division of Forensic Sciences. MAURICE WILLIAMS handed the UCO \$ 30, back and stated, "That's all I have. You can call me back later in 20 or 30 minutes."

39. On March 10, 2007, a UCO called Poison Work Phone 1 to arrange the purchase of heroin. The UCO recognized the voice of the person who answered Poison Work Phone 1 as MAURICE WILLIAMS. MAURICE WILLIAMS told the UCO to go to

the block of 7400 South Martin Luther King Dr. to purchase the heroin. The UCO proceeded to 7450 South Martin Luther King Dr. After he/she arrived at the location, the UCO met MAURICE WILLIAMS, DOMINIQUE WHITE, and Individual F. The UCO handed MAURICE WILLIAMS \$40 in United States currency, and MAURICE WILLIAMS handed the UCO 5 small plastic bags with a superman logo on them. The 5 bags collectively tested positive for the presence of approximately 1 gram of heroin at the Illinois State Police Division of Forensic Sciences.

40. On March 16, 2007 at approximately 9:51 a.m., a UCO placed a call to Poison Work Phone 1 to make arrangements to purchase of heroin. Following that call, the UCO met with MAURICE WILLIAMS and JAVON SMITH at 8215 S. Woodlawn Street. At that location the UCO entered the vehicle being driven by SMITH and occupied by MAURICE WILLIAMS. SMITH asked, "How many you want?" The UCO replied, "Ten of them." SMITH asked, "How many?" The UCO repeated, "Ten." SMITH said, "You must have hit the lottery today?" The UCO said, "I always get this much, I usually buy two or three hundred." SMITH said, "I'm just fucking with you." The UCO responded, "You know how I do, I usually buy two or three hundred. I'm going to get my income tax back and I'll hit you later tonight. You think I could get thirty from you?" MAURICE WILLIAMS replied, "Yeah, I can get it." While the UCO was inside the vehicle, WILLIAMS gave the UCO ten bags containing approximately 1.8 grams of heroin which later tested positive for heroin at the Illinois State Police Division of Forensic Sciences. In return, the UCO handed JAVON SMITH \$100 in United States currency.

41. On March 27, 2007, a UCO was walking in the area of 76th and Cottage Grove and was approached by a maroon minivan, license plate 765G003, driven by MARSHAWN WRIGHT. The UCO recognized this minivan as the van that had been used in previous narcotics transactions during this investigation. MARSHAWN WRIGHT stated to UCO “Did you just call the phone number?” Although the UCO had not called the Poison Line number, the UCO responded “Yes.” WRIGHT pulled up to the UCO and stated, “Get in.” The UCO got in the passenger side, rear door of the minivan and sat in a seat next to JAVON SMITH. The UCO said, “Let me get two.” The UCO handed DOMINIQUE WHITE two ten dollar bills. SMITH handed UCO two clear zip lock plastic bags, with blue dolphins on one side of the bags. The two bags collectively contained approximately .4 grams of heroin that tested positive for heroin at the Illinois State Police Division of Forensic Sciences.

B. Controlled Purchases Using Target Phone 4

42. On March 23, 2007, at the direction of law enforcement officers, Worker 2 placed several phone calls into Poison Work Phone 1 that went directly to voice mail. Later that day, at the direction of law enforcement officers, Worker 2 went to the area of 7900 South Cottage Grove and met an individual whom Worker 2 referred to as “the point man” who told Worker 2 that Poison Work Phone 1 was no longer being used to order heroin. The “point man” told Worker 2 that the new work phone number was (773) 567-5165, which is Target Phone 4.

43. As set forth below, from March 28, 2007 to April 05, 2007, UCOs conducted 9 controlled heroin buys using Target Phone 4 totaling approximately 50.3 grams of heroin.¹¹ The following defendants sold heroin to the UCOs after calls were placed into Target Phone 4: MAURICE WILLIAMS, MARSHAWN WRIGHT, MARIO REEVES, JAVON SMITH, and JONTALLE BOOKER. For each of the following calls, the UCO dialed Target Phone 4 for each call, except where the UCO received an incoming call.

44. On March 28, 2007 at 12:07 p.m., a UCO placed a call into Target Phone 4 and MAURICE WILLIAMS answered and asked, “Who is this?” The UCO replied, “This is Pete, I’m at 79th Street. Where you at?” MAURICE WILLIAMS replied, “Meet at 81st and Harper.” A short time later the UCO parked his UCV at 8114 S. Harper. The UCO then made a second phone call to the same number and MAURICE WILLIAMS stated “I’ll be right there.” A short time later a maroon Chevrolet van, bearing Illinois temporary license plate 765G003, arrived and parked directly in front of the UCO. The UCO got out of the UCV, approached the passenger side of the Chevrolet, and got inside. Once inside, the UCO observed JAVON SMITH seated in the drivers seat of the Chevy van, DOMINIQUE WHITE seated in the rear passenger side of the van, and MAURICE WILLIAMS in the rear driver’s side of the van. MAURICE WILLIAMS counted out and handed the UCO six clear zip lock plastic bags, with red tigers on one side, containing approximately 1.8 grams of heroin, which later tested positive for the presence of heroin at the Illinois State Police Division of

¹¹ Two other controlled purchases of narcotics were conducted, on April 5, 2007, and June 7, 2007, which are not referenced in this affidavit.

Forensic Sciences. In exchange, the UCO tendered \$60 in United States currency to SMITH. The UCO got out of the Chevrolet van, and walked back to the UCV.

45. On March 28, 2007, at approximately 12:56 p.m., a UCO placed a call to Target Phone 4 to make arrangements to purchase heroin. The UCO spoke to MAURICE WILLIAMS regarding the purchase of heroin. MAURICE WILLIAMS directed the UCO to 79th Street and Woodlawn Avenue. The UCO drove a UCV to 7911 South Woodlawn Avenue and parked. SMITH and MAURICE WILLIAMS arrived at 7919 S. Woodlawn Avenue in a maroon minivan, bearing Illinois temporary license 765G003, and parked. The UCO got out of the UCV and got in the vehicle driven by SMITH. The UCO asked for six bags and handed SMITH \$60 in United States currency. MAURICE WILLIAMS handed the UCO three bags containing approximately .7 grams of heroin that tested positive for heroin at the Illinois State Police Division of Forensic Sciences. After handing the UCO the three bags, MAURICE WILLIAMS instructed SMITH to return \$30 to the UCO because SMITH and WILLIAMS did not have an additional \$30 of heroin to sell to the UCO.

46. On March 29, 2007 at approximately 11:59 a.m., a UCO placed a call to Target Phone 4 to make arrangements to purchase heroin. During this call, the UCO asked, "What's up? This Pete." MAURICE WILLIAMS said, "Where you at?" The UCO replied, "I'm at 67th and Cottage. You got what we talked about, that three?" WILLIAMS responded, "Yeh." The UCO asked, "How long it's gonna take you?" MAURICE WILLIAMS said, "Give me twenty minutes." Following that call, the UCO drove to at 8300 South Stony Island Drive and met with MAURICE WILLIAMS, JAVON SMITH, and MARSHAWN WRIGHT in

their vehicle. At that location, the UCO got into their vehicle and WRIGHT handed the UCO 35 bags containing a total of approximately 6.7 grams of heroin. The UCO handed WRIGHT \$300 in United States currency and then returned to the UCV. The approximately 6.7 grams of narcotics in the 35 bags tested positive for the presence of heroin at the Illinois State Police Division of Forensic Sciences.

47. On April 05, 2007, a UCO called Target Phone 4 to arrange the purchase of heroin. MAURICE WILLIAMS answered Target Phone 4 and said, "Who is this?" The UCO replied, "This is Pete, I'm at 67th Street. Where you at?" MAURICE WILLIAMS replied, "Meet at 79th and Woodlawn." A short time later, the UCO arrived and parked at 7948 S. Woodlawn. The UCO then made a second phone call to the same number and MAURICE WILLIAMS stated, "I'll be right there." A short time later a maroon Chevrolet van bearing, Illinois temporary license plate 765G003, arrived and parked at 1201 E. 80th Street. The UCO answered a call on the undercover cell phone and MAURICE WILLIAMS instructed the UCO to come to the van. The UCO exited the UCV approached the front passenger's side of the van and entered. The UCO said, "I thought you said you were gonna walk towards me?" MAURICE WILLIAMS asked, "We good?" The UCO replied, "Yeh." MAURICE WILLIAMS counted out and handed to the UCO 35 clear ziplock plastic bags, with black scorpions on one side, each containing heroin. In exchange, the UCO handed MAURICE WILLIAMS \$300 in United States currency. MAURICE WILLIAMS handed the same \$300 to MARIO REEVES, who was seated in the rear of the van.

48. The UCO then asked MAURICE WILLIAMS if he could purchase additional bags of heroin. MAURICE WILLIAMS told the UCO to wait at that location. The UCO asked, “How long will it take for two hundred more?” MAURICE WILLIAMS responded, “I’ll give to you today. I’ll give twenty-five for the two-hundred.” The UCO asked, “How soon can you do it?” MAURICE WILLIAMS responded, “Now.” The UCO asked, “You got it?” MAURICE WILLIAMS responded, “Yeah, wait, let me pull around.” MAURICE WILLIAMS and MARIO REEVES drove away and a short time later returned to the same location in the same van and met the UCO again. During this second meeting, the UCO exited the UCV, approached the front passenger’s side of the van, and entered. MAURICE WILLIAMS counted out and handed the UCO 25 clear ziplock plastic bags, with black scorpions on one side, each containing a substance which appeared to be heroin. In exchange, the UCO handed MAURICE WILLIAMS \$200 in United States currency. MAURICE WILLIAMS handed the \$200 in United States currency to REEVES. The 60 bags purchased from MAURICE WILLIAMS and MARIO REEVES that day contained approximately 18.2 grams of heroin and tested positive for heroin at the Illinois State Police Division of Forensic Sciences.

49. On May 8, 2007, a UCO called Target Phone 4, (call 29555) and was able to identify the voice using Target Phone 4 as belonging to JONTALLE BOOKER.¹² During

¹² The identification of JONTALLE BOOKER was determined as follows: on or about May 3, 2007, law enforcement officers initiated a traffic stop on BOOKER. During this traffic stop, BOOKER provided an Illinois drivers license with the name JONTALLE Booker bearing his photograph. Based on his conversation with BOOKER during the stop, the officer developed a familiarity with BOOKER’s voice. Shortly thereafter, the officer listened to intercepted phone calls

this call, the UCO arranged to purchase two bags of heroin for \$20, and BOOKER directed the UCO to go to the area of 78th Street and Ellis in Chicago. During the call, JONTALLE BOOKER answered and the UCO asked, “Where you at man?” BOOKER answered., “I’m on 78th and Ellis sittin in the park, where...where you at?” The UCO answered, “Uh, I’m gonna be coming from like 85th and King Drive.” BOOKER then told the UCO, “Awright, hurry up my good guy, I’m gettin ready to work nights.” Shortly thereafter, at approximately 4:23 p.m., the UCO placed a call to Target Phone 4 (Call 29672). BOOKER answered and the UCO asked, “Man you told me to took a block...are you straight yet?” BOOKER then told the UCO, “My little shorty fittin to come to you.” A short time later, near 78th Street and Ellis in Chicago, the UCO met an individual who was subsequently identified by the UCO as Individual A, and purchased 2 bags which later tested positive for approximately .4 gram of heroin at the Illinois State Police Division of Forensic Sciences.

50. On May 8, 2007, a UCO placed a call into Target Phone 4. JONTALLE BOOKER answered Target Phone 4 and the UCO said, “It’s KIKI again sitting at McDonalds.” BOOKER replied, “Here I come. How many you need ready?” The UCO said, “I need about three man.” BOOKER said, “Alright here I come dude.” BOOKER directed the UCO to meet in the parking lot at McDonald’s, located at 79th and King Drive in Chicago. A short time later, the UCO arrived, parked a UCV in the lot, and waited for

on Target Phone 4 and positively identified the voice of BOOKER as the user of Target Phone 4 during those calls. In addition, JONTALLE BOOKER was identified by the name “JT” or “JONTALLE” during calls in which he was intercepted.

BOOKER. The UCO made additional phone calls to Target Phone 4 and BOOKER told the UCO that he would be right there. A short time later, a 1992 Buick Park Avenue bearing an Illinois temporary license plate of 519 H 928, arrived with JONTALLE BOOKER driving, and an unknown male (later identified as Individual A as the passenger. After BOOKER parked the Park Avenue, the UCO got out of the UCV and approached the passenger's side window of the Buick and leaned inside. The UCO said, "Hey what's up baby? I got thirty, man." BOOKER responded, "Alright." The UCO said again, "I got thirty on me." The UCO handed Individual A \$30, and BOOKER handed the UCO three black tinted plastic zip-lock bags which, in total, contained approximately .7 grams of heroin. The substance in these bags tested positive for the presence of .7 grams of heroin at the Illinois State Police Division of Forensic Sciences.

51. On May 17, 2007, a UCO placed a call into the Poison Line on Target Phone 4, and MAURICE WILLIAMS answered, and asked the UCO, "Who is this?" The UCO replied "This is Pete, I'm at 67th St. where you at?" WILLIAMS replied "Meet at 79th and King Dr." A short time later the UCO parked a UCV at 7904 S. King Dr., which is a McDonald's parking lot. The UCO then made a second phone call to the Target Phone 4 and MAURICE WILLIAMS stated "I'll be right there." A short time later the UCO observed a maroon Jeep Cherokee bearing Illinois temporary plate 716H730, being driven by AUKEY WILLIAMS.¹³ The Jeep stopped on the driver's side of the UCV and the UCO observed

¹³ Although the UCO did not know AUKEY WILLIAMS's face at the time of the purchase, the UCO viewed a photo lineup and identified a picture of AUKEY WILLIAMS as the person

MAURICE WILLIAMS exit the front passenger seat of the Jeep. MAURICE WILLIAMS approached the driver's side of the UCV and entered the UCV. Once MAURICE WILLIAMS was inside the UCV, the UCO stated, "How many you got?" WILLIAMS responded, "I can only get 54." The UCO said, "Man I usually do 60." MAURICE WILLIAMS responded, "Man, I can't give that to you right now my boss is in the car. Next time I hit you for sure." MAURICE WILLIAMS counted out and handed the UCO fifty-four clear zip lock plastic bags, with red rolling stone symbols on one side, in total containing approximately 10.8 grams of heroin. In exchange, the UCO gave MAURICE WILLIAMS \$500 in United States currency. MAURICE WILLIAMS then exited the UCV, returned to the passenger's side of the Jeep Cherokee being driven by AUKEY WILLIAMS, and got inside. The fifty-four bags contained approximately 10.8 grams of heroin and tested positive for heroin at the Illinois State Police Division of Forensic Sciences. Illinois State Police Division of Forensic Sciences.

52. On May 23, 2007, a UCO placed a call into the Poison Line on Target Phone 4, and MAURICE WILLIAMS answered. The UCO asked, "Is this Reese?" MAURICE WILLIAMS replied "Yeah, who is this?" The UCO replied, "This is Pete, I'm at 67th St. where you at?" MAURICE WILLIAMS replied, "Meet at 79th and King Dr." A short time later the UCO arrived and parked in the McDonald's parking lot at 7904 South King Drive. The UCO then made a second phone call to Target Phone 4 and MAURICE WILLIAMS

driving the Jeep Cherokee.

stated “I’ll be right there.” A short time later, the UCO observed a silver Buick bearing Illinois Temporary license plate 519H928, being driven by a person now known as JONTALLE BOOKER. The Buick stopped on the driver’s side of the UCV, and the UCO observed MAURICE WILLIAMS seated on the front passenger’s side. MAURICE WILLIAMS waved the UCO over to the silver Buick. The UCO stepped out of the UCV and approached the passenger’s side of the Buick, at which time MAURICE WILLIAMS instructed the UCO to get in the back seat. The UCO got in the rear passenger side of the vehicle and closed the door. Once inside, MAURICE WILLIAMS instructed JONTALLE BOOKER to drive around parking lot. The UCO asked MAURICE WILLIAMS, “You got that extra ten for me?” MAURICE WILLIAMS replied, “No I could only get five. We are hurting.” MAURICE WILLIAMS counted out and handed the UCO fifty-five clear zip lock plastic bags, with blue dolphins on one side, containing in total approximately 11 grams of heroin which tested positive for heroin at the Illinois State Police Division of Forensic Sciences. In exchange, the UCO tendered to WILLIAMS \$500 in United States currency.

53. On July 11, 2007, a UCO placed a recorded call to a Poison Line work phone to arrange a controlled purchase of heroin.¹⁴ During that call, LINDELL BLOUNT instructed the UCO to meet him at 79th Street and Cottage Grove Avenue.¹⁵ Shortly

¹⁴ On July 11, 2007 in the morning hours the Poison Line was operating on a different phone, 773-414-6570, rather than Target Phone 8.

¹⁵ The identification of LINDELL BLOUNT is based on the following: during a traffic stop on July 10, 2007, LINDELL BLOUNT provided an identification card and, after the stop, CPD officers ran LINDELL BLOUNT through a CPD database which yielded a photograph which matched the person the officers had stopped. The voice identification of LINDELL BLOUNT is

thereafter, BLOUNT called the UCO back and instructed the UCO to meet BLOUNT in the parking lot of Billy's Gyros at 7851 South Cottage Grove in Chicago. The UCO drove a UCV to Billy's Gyros and upon driving into the parking lot, BLOUNT directed the UCO to park the UCV in a particular spot. The UCO observed AUKEY WILLIAMS looking toward the UCO and nodding his head up and down. BLOUNT approached the passenger side of the UCV and told the UCO the heroin was on the ground in a Newport box. BLOUNT then asked, "Where the money? It's 55 in there I'll be right here when you count it out. I ain't going no where." The UCO handed BLOUNT \$500 of United States currency. The serial numbers of these bills had been recorded before the UCO gave them to BLOUNT. The UCO got out of the UCV, picked up the Newport box, re-entered the UCV, and saw the heroin inside the box, at which point BLOUNT asked if the UCO was "cool." The UCO replied "yes" and drove out of the parking lot. The Newport box contained 55 small plastic bags which later tested positive for the presence of approximately 11 grams of heroin at the Illinois State Police Division of Forensic Sciences.

54. After purchasing the heroin, the UCO observed BLOUNT approach AUKEY WILLIAMS and hand AUKEY WILLIAMS some amount of United States currency. Surveillance observed AUKEY WILLIAMS drive away from the location in a dark gray

based in part on the fact that in numerous calls intercepted over Target Phone 8, a certain individual was identified as "Lockjaw" which is a nickname for LINDELL BLOUNT. In addition, during a controlled purchase of heroin on July 11, 2007, the UCO who made the purchase developed a familiarity with BLOUNT's voice and subsequently reviewed calls in which "Lockjaw" was intercepted over Target Phone 8 and determined that the voice of "Lockjaw" was in fact LINDELL BLOUNT.

Cadillac, registered to Car Rental Company A, and a short time later CPD officers stopped AUKEY WILLIAMS. At that time, CPD seized \$500 from AUKEY WILLIAMS's person. The bills which comprised the \$500 seized from AUKEY WILLIAMS had the same serial numbers as the bills which the UCO had given to BLOUNT a short time earlier.

III. Post-Arrest Statements of VINCE GATHINGS, KENNETH HARRIS and MAURICE WILLIAMS.

55. On January 18, 2007, CPD officers arrested VINCENT GATHINGS at 722 East 79th Street Chicago, Illinois, for Drinking Alcohol on the Public Way. A subsequent custodial search of GATHINGS revealed several plastic bags on his person which tested positive for the presence of approximately 4.6 grams of heroin at the Illinois State Police Division of Forensic Sciences. GATHINGS was arrested by CPD. After officers advised GATHINGS of his constitutional rights, GATHINGS stated that he received the heroin from AUKEY WILLIAMS, who has a "stash house" located at 620 East 79th Street. GATHINGS provided information about AUKEY WILLIAMS to law enforcement with the expectation that he/she would receive a benefit from the Cook County State's Attorney's Office in relation to charges resulting from this arrest.

56. On July 18, 2007, officers and agents intercepted calls over Target Phone 8 indicating that KENNETH HARRIS was purchasing heroin for himself or other customers. A short time later, surveillance observed HARRIS meet with LINDELL BLOUNT, who was using Target Phone 8, and a hand-to-hand transaction took place, which appeared to be a drug transaction. CPD officers stopped the vehicle in which KENNETH HARRIS was a

passenger. Officers found HARRIS to be in possession of a small zip lock bag containing approximately .2 grams of heroin. Officers transported HARRIS to a CPD facility at Homan Square for further investigation. While at Homan Square HARRIS was given the Chicago Police Department's Advisement of Rights and Waiver which HARRIS read and signed.

57. After HARRIS read and signed the Advisement of Rights and Waiver he was questioned about his knowledge of the Poison Line. HARRIS provided information about the operation of the Poison Line, including but not limited to, the following:

a. HARRIS identified the following individuals after viewing a series of photographs: AUKEY WILLIAMS, MARIO REEVES, MAURICE WILLIAMS, LINDELL BLOUNT, TAVARIS WILLIAMS, VINCENT GATHINGS, NICOLE BOZEMAN, and LARRY JOHNSON.

b. HARRIS stated that AUKEY WILLIAMS runs the Poison Line which traffics heroin in the area of 79th Street and Cottage Grove Avenue in Chicago. HARRIS stated that MARIO REEVES and MAURICE WILLIAMS work with AUKEY WILLIAMS to run the Poison Line. HARRIS stated that MAURICE WILLIAMS pays the sellers and brings out the bundles (packs of heroin) when needed. HARRIS stated that MARIO REEVES performed similar duties for the Poison Line before his arrest on July 2, 2007.

c. HARRIS stated that individuals he knows as "Lockjaw," "Nuke," "Vince," "Vince's girl," and "Laro" (who HARRIS identified as LARRY JOHNSON) all sell heroin for AUKEY WILLIAMS. HARRIS stated that LARRY JOHNSON sells heroin for AUKEY WILLIAMS on 65th Street, between Ingleside and Drexel.

d. HARRIS admitted to officers that he had worked as a 'point man' for LARRY JOHNSON at 65th and Cottage Grove, directing customers where to go to purchase Poison Line heroin.

e. HARRIS stated that VINCE GATHINGS' girlfriend, NICOLE BOZEMAN, works at a car rental agency. HARRIS stated that some Poison Line workers rent cars through BOZEMAN and then use these autos to sell heroin for the Poison Line.

58. On September 14, 2007, CPD officers arrested MAURICE WILLIAMS for possession of a controlled substance, specifically 7 bags which officers believe contain heroin.

59. On September 14, 2007, at approximately 1:15 p.m., CPD officers observed MAURICE WILLIAMS, whom they knew based on prior investigations did not have a valid driver's license, driving a car. The officers drove up to MAURICE WILLIAMS just after he parked and exited his car. After being questioned by CPD officers, MAURICE WILLIAMS was unable to produce a valid driver's license and had no proof of insurance. Upon securing the car, an officer observed several small plastic bags containing a white substance in the center console of the car. The officer believed the white substance to be heroin. After being advised of his constitutional rights, MAURICE WILLIAMS stated, "I'm done." MAURICE WILLIAMS was arrested for possession of a controlled substance, specifically 7 bags which officers believe contained heroin. After his arrest, MAURICE WILLIAMS was taken to the 6th District Chicago Police Station and again was advised of his constitutional rights and provided information to the officers.

60. At approximately noon on September 15, 2007, MAURICE WILLIAMS agreed to speak with CPD officers. WILLIAMS provided information to law enforcement with the expectation that he/she would receive a benefit from the Cook County State's Attorney's Office in relation to charges resulting from this arrest. During the interview, MAURICE WILLIAMS provided information about the operation of the Poison Line, including but not limited to, the following:

a. AUKEY WILLIAMS runs the Poison Line which sells heroin around the 79th Street and Cottage Grove area. MAURICE WILLIAMS stated that he had been working for AUKEY WILLIAMS selling Poison Line heroin since January 2007 and he sells heroin daily from approximately 7:00 a.m. till 10:00 p.m.

b. AUKEY WILLIAMS gives MAURICE WILLIAMS heroin in "packs" or "bundles," which contain approximately 45 individual packets (containing a user-quantity of heroin) at a time. MAURICE sells two "packs" of heroin a day, or 90 packets. MAURICE is paid \$100 daily for selling heroin.

c. MAURICE also packages the heroin for street sales by mixing three Dormin pills, an over the counter sleeping agent, for every one gram of heroin. He uses the Dormin in this way in order to dilute the power of the heroin and increase its profitability.

d. TOMMIE BROWN also sells heroin for AUKEY WILLIAMS. MAURICE characterized BROWN as a "soldier like me," referring to someone who sells smaller quantities, such as user quantities.

61. On July 31, 2007, CPD officers engaged in a narcotics investigation conducted a field interview of AUKEY WILLIAMS. AUKEY WILLIAMS stated that he owned the apartment located at 4720 South King, Apt. 1W, Chicago, Illinois.

62. AUKEY WILLIAMS stated that he uses the apartment as an office for business, which he claimed was a towing company. AUKEY WILLIAMS also stated that he rented the apartment to TOM BROWN for \$2,000 a month.

IV. Seizures of Money and Drugs from Defendants

63. On January 17, 2007, CPD established surveillance of a vehicle driven by MARSHAWN WRIGHT and occupied by JAVON SMITH. Over the course of an hour, surveillance observed WRIGHT and SMITH conducting numerous narcotics transactions from their vehicle. Surveillance observed WRIGHT and SMITH drive in the parking lot of Billy's Gyros at 7855 South Cottage Grove. Surveillance also observed AUKEY WILLIAMS in a vehicle in that parking lot. Shortly thereafter, surveillance observed WRIGHT and AUKEY WILLIAMS exit their vehicles and then meet inside the restaurant.

Based on information from sources detailed above, repeated observations of AUKEY WILLIAMS picking up and dropping off workers, the hour of surveillance during which WRIGHT and SMITH conducted hand-to-hand transactions from their vehicle, and the experience of officers and agents, I believe that the purpose of this meeting was for AUKEY WILLIAMS to re-supply WRIGHT and SMITH with additional quantities of narcotics to sell. Following the meeting, as WRIGHT drove away from the parking lot, CPD initiated a stop on his vehicle at which time, WRIGHT abruptly got out of his vehicle, threw a bag

containing one hundred and ninety-four bags of heroin on the ground, and fled on foot from CPD officers. WRIGHT was apprehended and arrested. During a search of the vehicle, CPD officers located an additional one hundred bags of heroin under the driver's seat of WRIGHT'S vehicle. In total, the 194 bags of heroin seized contained approximately 70.3 grams of heroin which tested positive for heroin at the Illinois State Police Division of Forensic Sciences.

64. On July 10, 2007, calls intercepted over Target Phone 8 revealed that VINCE GATHINGS was using Target Phone 8, the Poison Line work phone.¹⁶ Several phone calls were intercepted in which GATHINGS told unknown customers where to meet him in order to purchase heroin. At approximately 9:23 a.m., GATHINGS began telling unknown customers that he was "out" and he need to get some "more," meaning he intended to get additional supplies of heroin. At approximately 9:52 a.m., GATHINGS had a conversation with AUKEY WILLIAMS, in which AUKEY WILLIAMS directed GATHINGS to meet him in the area of 77th Street and Eberhart. Surveillance was established and observed AUKEY WILLIAMS driving a dark gray four door 2007 Cadillac bearing an Illinois plate of 660 0236, rented from a company referred to herein as "Car Rental Company A," pull up and park at approximately 450 East 77th Street. After a short period of time, surveillance

¹⁶ The voice identification of VINCENT GATHINGS was determined as follows: on July 1, 2007, CPD officers conducted a traffic stop of a 2007 Chrysler 300 C. The vehicle was occupied by VINCENT GATHINGS, TAVARIS WILLIAMS, and a third person. GATHINGS provided identification bearing his photograph and his name. During the course of that stop, a CPD officer a conducted brief interview of GATHINGS. Following that stop, the same officer who interviewed GATHINGS identified the voice of GATHINGS on Target Phone 8 on calls 2268, 5110, and 5431.

observed a silver Buick Lucerne, bearing Illinois license plate 377 3015, being driven by GATHINGS, pull up and park by the gray Cadillac. TAVARIS WILLIAMS was seated in the rear passenger seat of the Buick Lucerne, and LINDELL BLOUNT was seated in the front passenger seat.¹⁷ Surveillance observed AUKEY WILLIAMS pass a small object from the Cadillac into the Buick Lucerne. Surveillance observed the Buick Lucerne drive out of the parking lot and head south on Vernon from 77th Street. Surveillance observed the Buick Lucerne a short time later at 80th and Evans. While the Buick was at or near 80th and Evans, GATHINGS, using Target Phone 8, had conversations with two customers and advised them to meet him. Surveillance observed an unknown female walk over to the driver's side of the Buick Lucerne which was parked in the 8000 block of Evans. After the Buick Lucerne pulled away from that location, and failed to use a turn signal, CPD officers stopped the Buick Lucerne at 1005 E. 79th Street. TAVARIS WILLIAMS and LINDELL BLOUNT were also in the Lucerne with GATHINGS. A CPD officer observed a clear plastic bag which appeared to contain heroin in the trunk area, nearest the back seats, which fold down to expose the trunk. By reaching through the rear passenger seat, officers recovered a clear plastic bag containing heroin in the front area of the trunk. The bag contained several, smaller, clear zip lock bags with Purple Stars which collectively contained approximately 7.4

¹⁷ The identification of TAVARIS WILLIAMS is based on the following: on July 1, 2007, CPD officers conducted a traffic stop of a 2007 Chrysler 300 C. The vehicle was occupied by VINCENT GATHINGS, TAVARIS WILLIAMS and another person. TAVARIS WILLIAMS provided identification bearing his photograph and his name. During the course of that stop, a CPD officer conducted a brief interview of WILLIAMS. Following that stop, the same officer who interviewed WILLIAMS identified the voice of WILLIAMS on Target Phone 8 on Calls 5355, 2994, and 31.

grams of heroin. The clear plastic bags recovered tested positive for 7.4 grams of heroin at the Illinois State Police Division of Forensic Sciences.

65. On July 17, 2007, several calls were intercepted over Target Phone 8, in which MAURICE WILLIAMS and then LINDELL BLOUNT arranged to meet Poison Line customers. Surveillance was established on a silver Buick Lucerne driven by VINCENT GATHINGS with LINDELL BLOUNT seated in the front passenger seat. On July 17, 2007, at approximately 9:15 a.m., LINDELL BLOUNT received a call on Target Phone 8 from a female customer waiting in a white Corsica on 78th and Woodlawn. BLOUNT, “Who is this?” UF said, “This is Harriet in the white Corsica.... I’m on 78th.” A short time later, surveillance observed VINCENT GATHINGS and LINDELL BLOUNT meet with an unknown female in the 7800 block of Woodlawn. The female got out of her vehicle and got into the Lucerne briefly, and then returned to her vehicle.

66. A short time later, on July 17, 2007 at 9:34 a.m., LINDELL BLOUNT, using Target Phone 8, (call 19717), received a call from KENNETH HARRIS¹⁸ who asked, “Yeah Joe, where you at?” BLOUNT asked, “who is this?” HARRIS answered, “I’m on uh...I’m

¹⁸ The voice identification of KENNETH HARRIS was determined, as follows: on July 18, 2007, CPD officers conducted a traffic stop of a blue Chevrolet Impala at 745 E 80th Street following a hand-to-hand drug transaction at 79th Street and South Chicago Street in the Aldi’s parking lot. During the stop, Kenneth HARRIS was in possession of a bag of approximately .2 grams of heroin. HARRIS was then placed under arrest, read his Miranda Rights, and transported to a CPD Facility for processing. At a later date, the CPD officer who conducted the stop listened to calls 25135 and 31691 intercepted over Target Phone 4 and identified HARRIS’s voice. On a later date, the same CPD officer also listened to intercepted calls 42 and 1299 over Target Phone 8 and identified HARRIS’s voice.

on Evans standing in the middle of the block.” BLOUNT answered, “Alright, stay right there man.” In summary, in this call, HARRIS, who acts as a “lookout” called BLOUNT to direct him to an area (“Evans”) where customers were waiting to purchase heroin. Shortly after this call was intercepted, CPD surveillance officers stopped the Lucerne occupied by BLOUNT and GATHINGS at 76th Street and Evans Street. During that stop, CPD officers recovered approximately 20 clear plastic bags from GATHINGS and \$120 United States currency from BLOUNT. The substance in the twenty clear plastic bags tested positive for 4.6 grams of heroin at the Illinois State Police Division of Forensic Sciences.

67. On July 18, 2007, at approximately 9:11 a.m., MAURICE WILLIAMS was using Target Phone 8 to complete heroin transactions and, based on calls intercepted over Target Phone 8, a transaction was to occur in the area of 8100 South Cottage Grove, with an unknown female. Surveillance was established at the area of 81st and Cottage Grove and observed a white Chevy Impala, bearing Illinois license plate LFL 602, pull into the gas station on the corner of 81st and Cottage Grove. Surveillance observed several unknown subjects approach the Impala for a moment, then walk away. Surveillance observed the Impala drive out of the gas station and park at 8110 South Cottage Grove. Surveillance observed an unknown female running towards the Impala at which time two CPD officers stopped the Impala.

68. VINCE GATHINGS was the driver of the Impala, and the passengers were MAURICE WILLIAMS and NICOLE BOZEMAN.¹⁹ During the stop, MAURICE WILLIAMS handed the CPD officers approximately \$360, and officers recovered \$40 from the other passenger NICOLE BOZEMAN. MAURICE WILLIAMS informed officers that he had no more heroin and that he had just finished selling all that he had. The officers conducted a covert money seizure of approximately \$400 from offenders WILLIAMS and BOZEMAN.

69. Moments after this stop, MAURICE WILLIAMS was intercepted on over Target Phone 8, (call 20532), stating that the officers who conducted the stop had failed to find the narcotics he was carrying. During the call, MAURICE WILLIAMS said, “They took the money, but I had the bags stashed, I couldn’t go this time, I wouldn’t giving them these bags B...they took that, they took the uh, they took, they took, took like \$400 and got, but the man I be needin the shit just as well man, he just told me ‘Key he said I be needin the shit man...he said next time I catch you Reese, please have 50 on him, please have fifty for me, please, on my momma B he said man you gotta talk...man because I finna to start doin

¹⁹ The identification of NICOLE BOZEMAN is based on, among other things, the following: on July 1, 2007, CPD officers conducted a traffic stop of a blue Chrysler 300 C. Occupying the vehicle were NICOLE BOZEMAN, a/k/a “Nikki”, VINCENT GATHINGS, and TAVARIS WILLIAMS, a/k/a “Nuke.” BOZEMAN provided identification bearing her photograph and her name. During this stop a CPD officer conducted an interview of BOZEMAN. On July 16, 2007, the same officer who interviewed BOZEMAN listened to a series of intercepted calls over Target Phone 8 in which the female caller using the phone identified herself as “Nikki.” Based on his interview of BOZEMAN, and listening to calls 19314, 19316, 19346, and 19372, the CPD officer identified the intercepted voice as BOZEMAN.

this, we finna to start doin this once a week, you hear me ‘Key?’” AUKEY WILLIAMS responded, “Right.” In summary, I believe that in this call MAURICE WILLIAMS warned AUKEY WILLIAMS that the officers intended to stop this vehicle again and to take the heroin (“fifty”).

70. A short time later surveillance was established in the area of 74th Street and Lawrence and, at approximately 9:35 a.m., officers stopped the Impala, with the same three occupants, GATHINGS, BOZEMAN, and MAURICE WILLIAMS. During the stop, CPD officers recovered one clear plastic bag containing 42 small Ziplock bags with green tint and white dollar signs on one side, each containing heroin, recovered from the person of MAURICE WILLIAMS. The CPD officers also recovered one small Ziplock bag with green tint and white dollar signs on one side from the person of BOZEMAN, also containing heroin. The substances in the 43 clear plastic bags tested positive for 10.4 grams of heroin at the Illinois State Police Division of Forensic Sciences.

V. Additional Calls Intercepted Over Target Phones

A. Supply of Heroin

71. On May 18, 2007, AUKEY WILLIAMS had a conversation, (call 828), on Target Phone 5 with MAURICE WILLIAMS during which MAURICE asked, “Damn that’s crazy the door was open and the shit was out?” AUKEY said, “Like a motherfucker.” MAURICE said, “Damn that ain’t good. I thought I put it in the fender real good. The shit must have fell as soon as I closed the door. I don’t like it. You have the cup and the shit though. Everything still in the car?” AUKEY said, “Yep.” MAURICE said, “Everything

was in the house (unintelligible) was in there.” AUKEY agreed, “Yep.” A short time later, in the same call, MAURICE said, “Wasn’t he...they came and knocked on the door.” AUKEY responded, “But see the whole thing with that is probably he’d came and got the door open the door would have been open but he ain’t had no reason to go in the garage.” MAURICE agreed, “uh hah ...no reason at all.” AUKEY said, “I took my quarter key with me. I have a quarter key with me.”

72. On May 20, 2007, at approximately 8:55 p.m., AUKEY WILLIAMS had a conversation, (call 1432), on Target Phone 5 with TOM BROWN.²⁰ WILLIAMS asked BROWN, “You put the bag in the refrigerator?” BROWN asked, “Put what in the refrigerator?” WILLIAMS said, “This bag.” BROWN answered, “uh uh(negative).” WILLIAMS complained, “Man I had 100 grams down here B, I can’t find it.” BROWN said, “Hmmm ain’t no motherfucker move around when we was there.” A short time later during the conversation, WILLIAMS said, “[unintelligible] ...no place to hide nothing in this...” BROWN said, “Not the one that usually be in the cabinets or drawers, did you check right there?” WILLIAMS said, “Yea. I looked.” BROWN asked, “That that wasn’t the one?” WILLIAMS said, “Naw.” BROWN asked, “Huh?” WILLIAMS responded, “There ain’t nothing in the cabinets or drawers down here.” BROWN said, “There should be one in the uh, in the drawer, next to the refrigerator...or in the cabinet right there.” WILLIAMS said,

²⁰ The voice of identification TOM BROWN is based on the following: on August 1, 2007, CPD Officers initiated a traffic stop of BROWN. BROWN provided identification bearing his photograph and his name. During the stop, a CPD officer interviewed BROWN. On that date, the same CPD officer who interviewed TOM BROWN listened to calls 1201, 1437, and 1468 intercepted over Target Phone 5 and identified TOM BROWN’s voice on those calls.

“I’m so mad right now.” BROWN said, “You say what?” WILLIAMS repeated, “I said I’m so mad right now.” In summary, in this call AUKEY WILLIAMS and BROWN discuss 100 grams of heroin that AUKEY WILLIAMS has misplaced.

73. On May 20, 2007, at approximately 9:11 p.m., AUKEY WILLIAMS had a conversation, (call 1437), on Target Phone 5 with and an unknown male(UM). AUKEY WILLIAMS said, “Man I can’t find it.” UM said, “Shit which one was it?” AUKEY WILLIAMS asked, “What you mean? Which one was what?” UM, “You talking about the ratchet?” AUKEY WILLIAMS said, “Hell nah.” UM responded, “Oh you talking about the bag.” AUKEY WILLIAMS said, “Man I lost 100 grams.” UM said, “Oh my goodness.” AUKEY WILLIAMS said, “Yeah it was in the refrigerator man.” In summary, in this call AUKEY WILLIAMS and the UM discuss the 100 grams of heroin that AUKEY WILLIAMS kept in the refrigerator and has misplaced.

74. On May 20, 2007, at approximately 9:21 p.m., AUKEY WILLIAMS had another conversation, (call 1439), on Target Phone 5 with TOM BROWN. AUKEY WILLIAMS said, “The shit ain’t in there B.” BROWN said, “G I’m talking about ain’t nobody go in the refrigerator.” AUKEY WILLIAMS replied, “I’m talking about missing a whole two pounds.” BROWN asked, “You say what?” AUKEY WILLIAMS responded, “It’s the whole two pounds.” BROWN replied, “Ain’t nobody have a key B.” AUKEY WILLIAMS said, “A key.” BROWN asked, “You said what?” AUKEY WILLIAMS said, “Anybody else got no key.” BROWN said, “You got yours right back.” In summary, AUKEY WILLIAMS and BROWN again discuss missing narcotics although in this call

WILLIAMS indicates that he is missing almost one kilogram of heroin. BROWN and WILLIAMS then agree that no one else has a key to the location where the heroin had been stored.

75. In summary, the four calls in the previous four paragraphs describe how AUKEY WILLIAMS is in possession of large amounts of raw heroin which he was storing at a location known to other defendants, particularly TOM BROWN, which was misplaced or stolen.

76. The following call is an example of MAURICE WILLIAMS storing an amount of raw heroin for the Poison Line. On June 26, 2007, MAURICE WILLIAMS had a conversation (call 258) on Target Phone 8 with an unknown female (UF) in which MAURICE WILLIAMS said, "Babe, one more favor." UF said, "What?" MAURICE WILLIAMS asked, "Could you look in that uh...uh dresser drawer, it's right under the dressed drawer...they got the uh...the raw up there for me, could you bring it to the door for me?" In summary, MAURICE WILLIAMS is instructing an unknown female to bring him a certain amount of raw, meaning uncut, heroin that he had hidden underneath a dresser drawer.

B. Preparing Heroin by Mixing With Cutting Agents and Bagging It.

77. On May 22, 2007, AUKEY WILLIAMS had a conversation (call 10351) on Target Phone 4 with JONTALLE BOOKER. During the conversation AUKEY WILLIAMS told BOOKER, "Go onto 71st and buy three uh...three bottles of Dormin and uh packs of bags G...call me right back. Where you at right now?" BOOKER said, "I'm on Vernon. You say

buy what?" AUKEY WILLIAMS repeated, "Uh...three boxes of Dormin and a bundle of bags just call me when you get in there." BOOKER responded, "Alright." AUKEY WILLIAMS said, "Hurry up B." In summary, AUKEY WILLIAMS directed BOOKER to buy small bags to hold user quantities of heroin, and Dormin, which is a cutting agent used to dilute the heroin, thereby increasing the profit on each sale.

78. On July 10, 2007 MAURICE WILLIAMS had a conversation, (call 13361), with AUKEY WILLIAMS on Target Phone 8. MAURICE WILLIAMS said, "Hello." AUKEY WILLIAMS asked, "Where y'all at?" MAURICE WILLIAMS answered, "Baggin up." AUKEY WILLIAMS said, "Huh." MAURICE WILLIAMS said, "83rd and Cottage Grove." AUKEY WILLIAMS asked, "Y'all bagged up?" MAURICE WILLIAMS said, "Uh uh not like that." AUKEY WILLIAMS said, "Shit pull up in the Dollar Store on St. Lawrence." MAURICE WILLIAMS answered, "Awight." In summary, in the above call MAURICE WILLIAMS told AUKEY WILLIAMS he was not done dividing the heroin into smaller bags for distribution.

79. The following call is an example of MAURICE WILLIAMS meeting to sell customers heroin from the Poison Line. On June 26, 2007 MAURICE WILLIAMS had a conversation, (call 332), with MARIO REEVES on Target Phone 8. MARIO REEVES asked, "Where you at B?" MAURICE WILLIAMS replied, "I'm finnin to get ready to come pick you up...you gotta give me like seven minutes. I gotta hit these customers on Langley aight." MARIO REEVES responded, "Aight." In summary, MAURICE WILLIAMS

explained that he will pick up MARIO REEVES after he sells heroin to some customers on Langley Street in Chicago.

C. Serving Poison Line Customers.

80. On May 1, 2007, at approximately 12:47 p.m., JONTALLE BOOKER, using Target Phone 4, received a call, (call 745), from an unknown male (“UM”). The UM stated, “Yeah, this is Big Jimmy on 82nd and Woodlawn. BOOKER responds, “Here I come my dude, how many you need direct?” The UM answers, “Uh, two.” BOOKER responds, “Okay, I getting ready to pull up.” In summary, BOOKER asked how many bags of heroin the customer needed, and the customer stated “two.”

81. On May 29, 2007 AUKEY WILLIAMS had a conversation, (call 31156) on Target Phone 4 with an unknown male(UM). AUKEY WILLIAMS said, “Hello.” UM responded, “Hey there B where you at?” AUKEY WILLIAMS responded, “You gotta come on 80th and Maryland.” UM said, “80th and Maryland. You there right now?” AUKEY WILLIAMS, “Yeah.” UM answered, “Alright I be there in a minute.”

82. On June 27, 2007 AUKEY WILLIAMS had a conversation (call 887) on Target Phone 8 with an unknown female(UF). AUKEY WILLIAMS asked, “Who you been talking to all morning?” UF said, “Oh I’m sorry ‘Key’ where you at? I need two.” AUKEY WILLIAMS asked, “Where you at right now?” UF responded, “I’m on 80th and Evans.” AUKEY WILLIAMS said, “Be standing in between 80th and 81st and Cottage.” UF answered, “Alright.”

83. On June 28, 2007 AUKEY WILLIAMS had a conversation, (call 1303) on Target Phone 8 with an unknown male (UM). AUKEY WILLIAMS asked, "What up Rob where you at?" UM answered, "I'm on Avalon and 82nd." AUKEY WILLIAMS said, "I'm right here. I'm right behind you. What you want me to have ready for you?" UM said, "Four." AUKEY WILLIAMS replied, "Alright I'm right behind you I be turning off Woodlawn." In summary, in this call I believe AUKEY WILLIAMS asked the customer how much heroin the customer wanted and advised the customer that he would meet the customer with the drugs.

84. On July 22, 2007 AUKEY WILLIAMS had a conversation, (call 23558), on Target Phone 8 with an unknown female (UF). UF asked, "AUKEY?" AUKEY WILLIAMS answered, "Yea." UF said, "This Tanya, Carl's wife." AUKEY WILLIAMS said, "Yea, UF asked, "Thursday could I hook up with you? I want to do something." AUKEY WILLIAMS responded, "Yea just call the phone." UF said, "I'm gonna call the number cause I want you to give me three bananas. Could I have three whole bananas?" AUKEY WILLIAMS said, "Alright." UF asked, "OK how much do I gotta bring with me?" AUKEY WILLIAMS responded, "270." UF then said, "Cool alright have me ready Thursday morning. I'm gonna call you at this number and I will meet you wherever."

85. In summary, in call 23558, AUKEY WILLIAMS arranged to sell approximately 27, or perhaps 30, bags of heroin to the unknown female in exchange for \$270. In the other calls set forth above, AUKEY WILLIAMS directed customers where to meet in order for AUKEY WILLIAMS to sell the customer an amount of heroin.

86. On June 27, 2007, MARIO REEVES had a conversation, (call 1219), on Target Phone 8 with an unknown male (UM) during which the UM said, “Hey joe...Hey man you all said to come up to 78 and Drexel.” REEVES replied, “Yeah yeah, park and hop out. You are going to see them out here.” The UM asked, “ Uhh park where now?” REEVES responded, “Just come on 78 and Drexel and hop out of your car, you are going to see them out here,” The UM said, “Uhh alright blue car. I should be there like.” In summary REEVES directed the unknown male customer to a location where he could meet a Poison Line worker who would sell the unknown male heroin.

87. On May 1, 2007, at approximately 12:47 p.m., JONTALLE BOOKER, using Target Phone 4, received a call, (call 745), from an unknown male (UM). The UM stated, “Yeah, this is Big Jimmy on 82nd and Woodlawn.” BOOKER responded, “Here I come my dude, how many you need direct?” The UM answered, “Uh, two.” BOOKER responded, “Okay, I getting ready to pull up.” In summary, BOOKER in the above call informs a customer he is on his way to meet the customer and asked how many bags of heroin the customer wants to purchase.

88. The following call is an example of KENNETH HARRIS acting as a “point man” by gathering customers for the Posion Line. On May 15, 2007, KENNETH HARRIS had a conversation, (call 25135), with JONTALLE BOOKER on Target Phone 4. BOOKER asked, “Yeah, who all over there who needs some?” An unknown male answered, “I don’t know I’m just I’m just hey I’m just by myself I mean but Kenny with me but I’m I’m.” BOOKER said, “Man where the fuck Kenny at let me holler at him.” HARRIS said, “Yeah.”

BOOKER responded, “Where you all, Kenny?” HARRIS said, “Yeah.” BOOKER repeated, “Where you all standing at right now?” HARRIS replied, “We right here on 79th and Cottage, walking to Ellis.” BOOKER directed, “Nah go to uh hey I got some people on Maryland man. Grab all their money Kenny cuz Terminator and them out there man.” HARRIS said, “Can’t hear what you say.” BOOKER said, “I said Santa Claus I need you to grab all their money B and come on Evans on 80th I’m gonna get that shit together.” HARRIS replied, “Okay.” BOOKER said, “Call me back and see how many bags altogether and I’m just show ya I’m gonna be just give that shit to ya.” HARRIS confirmed, “Okay, I gotcha.”

89. In summary, BOOKER directed HARRIS to walk the customers to a certain location, collect their money, and call BOOKER back to inform BOOKER how many bags BOOKER should bring to sell to these customers.

90. The following call is an example of a customer calling into Target Phone 4 at the direction of KENNETH HARRIS. On May 1, 2007, JONTALLE BOOKER had a conversation, (call 1899), with an unknown male (UM) on Target Phone 4. The UM said, “OK well naw, I got with Kenny earlier and he gave me this number. I thought you all were on Cottage, 65th?” BOOKER said, “Naw B we ain’t doin that.” The UM asked, “You all meet up on the 9 where you use to be, on 79th?” BOOKER answered, “Yeah.” The UM asked, “Right on Cottage right?” BOOKER said, “Yeah.” The UM said, “It’s still Poison though right?” BOOKER responded, “Yeah.”

91. In summary, in call 1899 a customer says he received the phone number for Target Phone 4 from “Kenny,” meaning KENNETH HARRIS and wanted to know if this was the Poison Line.

92. The following call is an example of KENNETH HARRIS informing JONTALLE BOOKER that some heroin has been stolen. On May 22, 2007, KENNETH HARRIS had a conversation, (call 10345), with JONTALLE BOOKER on Target Phone 4. BOOKER asked, “This Kenny?” HARRIS replied, “Yeah.” BOOKER said, “Give me like 30 Kenny...30 minutes Kenny, I’m waiting boy.” HARRIS responded, “Hey uh call “Key” and tell him man...this nigger say somebody stole his stuff down here jo.” BOOKER asked, “Who?” HARRIS answered, “Huh lil(unintelligible).” BOOKER said, “Shh, alright.” HARRIS, “About nine of them, about nine of them left man.” BOOKER said, “Alright.” HARRIS said, “Call him and ask him what he want me to do man.” BOOKER answered, “Alright.”

93. In summary, in call 10345 BOOKER informed HARRIS he is waiting for a new supply of heroin, and HARRIS related to BOOKER that one of the Poison Line workers was claiming his heroin was stolen. HARRIS wanted BOOKER to call AUKEY WILLIAMS and inform him about the theft.

94. The following calls are examples of NICOLE BOZEMAN using the Poison Line work phone, waiting for a new supply of heroin, taking orders and setting up Poison Line heroin sales. On July 16, 2007, NICOLE BOZEMAN had a conversation, (call 19316), in which she was using Target Phone 8, with an unknown male (UM), during which the UM

said, “Yeah this is Silky.” BOZEMAN replied, “Where you at?” UM said, “78th and Langley.” BOZEMAN said, “I’m looking right at you just stay right there we are waiting to get some more.” In summary, during this call, BOZEMAN told a customer that she was waiting for a new supply of heroin.

95. On July 16, 2007, NICOLE BOZEMAN had a conversation, (call 19322), on Target Phone 8 with an unknown male (UM). The UM asked, “Hey you are still coming to 78th and Evans?” BOZEMAN answered, “We are on our way right now.” The UM said, “Alright.” In summary, during this call, BOZEMAN told a customer that she was on the way to deliver heroin at 78th and Evans.

96. On July 16, 2007, NICOLE BOZEMAN had a conversation, (call 19427), on Target Phone 8 with an unknown female (UF). BOZEMAN asked, “What’s up?” UF replied, “OK you still working?” BOZEMAN asked, “Whats you, where you at?” UF said, “I’m on 76th and Ellis baby. This is Tina I want two.” BOZEMAN replied, “You where?” UF said, “On 76th and Ellis.” BOZEMAN said, “Be outside.” In summary, during this call, a customer (“Tina”) advised BOZEMAN that she wanted to bags of heroin and BOZEMAN told the customer that to wait outside for BOZEMAN to arrive at 76th and Ellis.

97. On July 18, 2007, NICOLE BOZEMAN, using Target Phone 8, had a conversation, (call 20717), with and unknown male(UM) in which the UM said, “What’s up? This Old Rob.” BOZEMAN answered, “What’s up Rob. Where you at?” The UM replied, “I’m with my nephew he on 81st and Ingleside, my nephew Mike, he wants two.” BOZEMAN asked, “You in a car?” The UM said, “No he walking. He want to know where

you want him to walk to. He just wanted to use my phone.” BOZEMAN answered, “82nd and Woodlawn.” In summary, during this call BOZEMAN recognized the customer “Rob,” and directed “Rob” to a location where “Mike” could purchase two bags of heroin.

98. On July 18, 2007, NICOLE BOZEMAN, using Target Phone 8, had a conversation, (call 20747), with an unknown male (UM) in which the UM said, “Hey this Snoop.” BOZEMAN answered, “Hey Snoop.” The UM said, “Hey tell Kenny to send two,” BOZEMAN said, “ Alright.” In summary, during this call BOZEMAN recognized the customer “Snoop,” and arranged to have KENNETH HARRIS (“Kenny”) get two bags of heroin for “Snoop.”

99. On July 18, 2007, at approximately 11:03 a.m. NICOLE BOZEMAN, using Target Phone 8, had a conversation, (call 20749), with KENNETH HARRIS. BOZEMAN asked, “How many he want?” HARRIS said, “ Hold on. How many you want? [speaking to someone in the background] I need three. You want one? [speaking again to someone in the background] Four.” BOZEMAN asked, “Four?” HARRIS said, “Yea.” BOZEMAN said, “And you got an order for four more alright.” HARRIS stated, “I got an order for four altogether.” BOZEMAN disagreed, saying, “No you got four with you now and the people up there that want two. They are up there waiting on you.” HARRIS said, “Oh okay.” In summary, BOZEMAN discussed with HARRIS the number of bags of heroin which various customers had requested. BOZEMAN was using the work phone and needed to know how many bags of heroin to supply to the customers who were present with HARRIS.

100. Shortly after this call, on July 18, 2007, at approximately 12:28 p.m., NICOLE BOZEMAN had a conversation, (call 20843) on Target Phone 8 with KENNETH HARRIS. HARRIS, “Hey this Kenny I got Jackie right here.” BOZEMAN replied, “OK Kenny you gotta give us a minute. We finna to go pick up some now. How many she want?” HARRIS, speaking to someone in the background, asked, “How many you want? two two” BOZEMAN asked, “He want two?” HARRIS can then be heard asking someone in the background again, “She want three? OK call back in 15 minutes.” In summary, in the above calls BOZEMAN used the Poison Line work phone to coordinate sales of heroin by speaking with customers or another worker and arranged locations to conduct the sales of heroin.

101. On the July 16, 2007, BOZEMAN conducted approximately 19 similar calls in which she arranged sales of Poison Line heroin using Target Phone 8. On July 28, 2007, BOZEMAN engaged in approximately 30 similar calls in which she arranged sales of Poison Line heroin.

102. On May 26, 2007, at approximately 4:06 p.m., (call 573), GATHINGS called an unknown male, who was using Target Phone 8, and said, “Look why don’t you do me a favor, call Key and tell him I said uh call me.” The UM answered, “Alright.” GATHINGS asked the UM, “And see if I could uh if me and you could do the rest of the day together.” The UM answered, “At the time uh...shit he got somebody workin’ right now though.” GATHINGS asked, “What uh (unintelligible) won’t you check with, ask the old man could I get a blow and just tell him I work in the morning.” In summary, in this call GATHINGS asked the UM, who was working the Poison Line work phone, to call AUKEY WILLIAMS

(“Key”) and ask him if GATHINGS and the UM could begin working the Poison Line together. The UM told GATHINGS that WILLIAMS already had another person working the Poison Line at the time. GATHINGS then asked the UM to ask WILLIAMS if GATHINGS could get a user amount of heroin (“blow”) and in return GATHINGS would work the Poison Line the next morning.

103. On July 1, 2007, at 11:15 a.m., (Call 4682), GATHINGS called MAURICE WILLIAMS, who was using Target Phone 8, and asked, “What’s happening captain.” WILLIAMS asked, “You fittin’ to come out?” GATHINGS answered, “Hell yeah.” MAURICE WILLIAMS said, “Come on out and make some money deezy, cat daddy.” GATHINGS asked, “What time, hey, what time, you want to?” MAURICE WILLIAMS answered, “yeah...whenever you...come out now.” In summary, in this call GATHINGS called MAURICE WILLIAMS on the Poison Line work phone to find out whether someone was working the work phone. WILLIAMS then asked GATHINGS to come work the Poison Line to make some money.

104. On July 9, 2007, at 11:04 a.m., (call 147), an unknown male (UM) called BLOUNT, using Target Phone 8, and stated, “Yeah this Tre-Ball’s uncle...uh...I’m on 83rd and...um...Cottage at the Family Dollar, I need a two piece dinner.” BLOUNT told the UM, “You got to come to...uh...80th and Evans.” The UM asked, “80th and what?” BLOUNT answered, “Evans.” The UM stated, “Okay, alright.” In summary, in this call BLOUNT arranged to sell a customer 2 bags of heroin (“I need a two piece dinner”) and arranged to meet (“80th and what?”) the customer.

105. On July 10, 2007 at 5:13 p.m., (call 14252), BLOUNT, using Target Phone 8, called Sarah LNU and stated, “Hey Sarah.” Sarah answered, “What?” BLOUNT stated, “could you bring 5 out?” “Sarah” answered, “Awright.” In summary, in this call BLOUNT called “Sarah” to “re-supply” him with 5 bags of heroin (“could you bring 5 out?”) so that he could continue to make sales to Poison Line customers.

106. On July 10, 2007, at 9:36 a.m., (call 13425), an unknown female (“UF”) called VINCENT GATHINGS, who was using Target Phone 8, and stated “Yeah it’s Cat.” GATHINGS stated, “You know what she so full of shit (unintelligible) man we been up here at White Castles and shit.” The UF stated, “Huh, you so, uh uh...you say call back at 10?” GATHINGS stated, “Alright well look I finnin’ to go grab some more...is your number 437?” The UF answered, “Uh huh.” GATHINGS stated, “can I call you back when I pick it up or you just want to meet me straight up there?” The UF asked, “Yeah, how long?” GATHINGS stated, “In about fifteen minutes.” In summary, in this call, “Cat” was calling GATHINGS in order to purchase heroin. “Cat” asked GATHINGS if she needed to call back at 10:00 a.m. in order to buy some heroin. GATHINGS then told “Cat” that he was about to go get re-supplied with heroin (“I finnin’ to go some more”) and asked what her phone number was (“is your number 4-3-7”). GATHINGS asked if he could call her after he was re-supplied with more heroin (“can I call you back when I pick it up or you just want to meet me straight up there?”).

D. Supervising Poison Line Workers.

107. On May 15, 2007, at approximately 10:17 a.m., JONTALLE BOOKER, using Target Phone 4, received a call, (call 55769) from AUKEY WILLIAMS. AUKEY WILLIAMS asked BOOKER, “what’s the deal?” BOOKER answered, “it’s slow nigga, I got eleven bags left.” AUKEY WILLIAMS asked, “out of both fifties?” BOOKER then answered “Hell no, LARO had one 50, Don.”

108. In summary, BOOKER told AUKEY WILLIAMS that business is slow and that he had eleven bags of heroin left to sell. AUKEY WILLIAMS stated he believes that BOOKER was originally supplied two bags containing fifty bags of heroin each (“out of both fifties?”). BOOKER explained to AUKEY WILLIAMS that “Laro” (LARRY JOHNSON) had one of the original bags containing fifty bags of heroin.

109. On May 18, 2007, at approximately 1:35 p.m., JONTALLE BOOKER using Target Phone 4, received a call, (call 64528), from MAURICE WILLIAMS who asked “where you at jack?” WILLIAMS asked, “how many uh you did folk?” BOOKER answered, “One.” WILLIAMS asked, “You only did one five hundred bundle, B?” BOOKER answered, “Yeah, I’m working on the other one now.” In summary, WILLIAMS asked BOOKER how much heroin he had sold thus far, and asked BOOKER if he had only sold one \$500 bundle, (“You only did one five hundred bundle, B?”) BOOKER answered that he had sold one bundle and was working on the second bundle at the time of the call.

110. On May 28, 2007, at approximately 3:47 p.m., JONTALLE BOOKER using Target Phone 4, received a call (Call 29125) from MARIO REEVES who asked BOOKER, “shit what you done did, B?” BOOKER answered, “25.” REEVES asked, “since we saw

you?” In summary, REEVES asked BOOKER how many bags of heroin had he sold thus far. BOOKER answered “25,” meaning twenty five bags of heroin.

111. On May 10, 2007, AUKEY WILLIAMS had a conversation(Call 34061) on Target Phone 4 with JONTALLE BOOKER. BOOKER said, “Hello.” AUKEY WILLIAMS asked, “Where you at fool?” BOOKER responded, “Shit I’m out here.” AUKEY WILLIAMS said, “Man your ass sleep some mother fucking where.” BOOKER responded, “Nigga I’m out here I’m on 76th and Langley.” AUKEY WILLIAMS asked, “Where the fuck Reese at?” BOOKER answered, “I ain’t talk to that nigga since last night.” AUKEY WILLIAMS asked, “Alright...no one call you?” BOOKER said, “Hell naw that’s what I’m waiting on. So I can break one of my fifties down uh and hand it to him.” AUKEY WILLIAMS stated, “It should have been some quarters in there.” BOOKER said, “Naw I had took one of his quarters last night and did twenty five out of.” AUKEY WILLIAMS, “Alright.” BOOKER said, “So I’m going to get... Hold on. Hello.” AUKEY WILLIAMS asked, “Yeah, you get up with Reese last night?” BOOKER responded, “Hell naw.” AUKEY WILLIAMS asked, “So you still got all the bread on you?” BOOKER asked, “Huh?” AUKEY WILLIAMS said, “So you still got all the bread on you from yesterday [unintelligible]?” BOOKER said, “Un ...um...he got it...Oh yeah...all I got is forty dollars.” AUKEY WILLIAMS said, “Huh?” BOOKER responded, “I got forty dollars....I paid little [Individual A] off that uh...” AUKEY WILLIAMS asked, “Off the quarter?” BOOKER said, “Yeah.” AUKEY WILLIAMS responded, “Alright.”

112. In this call, AUKEY WILLIAMS was checking on BOOKER to make sure he was out selling heroin. AUKEY WILLIAMS was also checking to see if BOOKER had given the money from the previous day's sales of heroin to MAURICE WILLIAMS. BOOKER related to AUKEY WILLIAMS that MAURICE WILLIAMS had the money and that Individual A, another worker, was paid from the proceeds of the day's sales.

113. On May 10, 2007 MAURICE WILLIAMS had a conversation, (call 37707), on Target Phone 4 with JONTALLE BOOKER. BOOKER said, "Hello." MAURICE WILLIAMS asked, "You did that fifty?" BOOKER responded, "Huh?" MAURICE WILLIAMS repeated, "You did that fifty right?" BOOKER confirmed, "Yeah." MAURICE WILLIAMS asked, "Where you at?" BOOKER said, "Bitch, it's hot as hell I'm on Drexel." MAURICE WILLIAMS asked, "Huh? On what and Drexel." BOOKER repeated, "81st." MAURICE said, "Huhh" and BOOKER asked, "Where you at?" MAURICE WILLIAMS said, "We'll meet up with you in minute. Chill."

114. In summary, MAURICE is checking to make sure BOOKER has sold fifty bags of heroin, and is trying to establish BOOKER's location in order to meet and retrieve the money from those sales.

115. On June 30, 2007 at 8:05 p.m., (call 4087), MAURICE WILLIAMS, called TAVARIS WILLIAMS, who was using Target Phone 8, and asked, "What up boy, how you looking?" TAVARIS WILLIAMS answered, "Alright, I'm on that uhh, I'm on that sec...on that last one. Tell Key on that last one he got me. I finished that uhh forty-eight." MAURICE WILLIAMS asked, "What he gave you two fifties?" TAVARIS WILLIAMS

answered, "Who, nah, he gave me, it was like three bundles over there. I'm on the last one."

MAURICE WILLIAMS stated, "Oh, okay, okay, okay, alright."

116. In summary, in this call, MAURICE WILLIAMS was asking how much heroin TAVARIS WILLIAMS had remaining to sell ("how you looking?"). TAVARIS WILLIAMS answered by indicating that he still had one bundle of heroin left to sell ("on that last one") and that he had already sold two bundles ("it was like three bundles over there.")

117. On July 1, 2007, surveillance observed TAVARIS WILLIAMS driving a Chrysler 300C. At approximately, 6:12 p.m., CPD officers stopped the Chrysler 300 C for a traffic violation. The occupants of the Chrysler 300 C were TAVARIS WILLIAMS, VINCENT GATHINGS and NICOLE BOZEMAN. During the stop, officers observed that one of the cellular telephones in TAVARIS WILLIAMS's possession kept ringing. A CPD officer asked WILLIAMS's for the numbers of the two cellular phones in WILLIAMS's Possession. TAVARIS WILLIAMS's voluntarily provided the numbers for both phones, one of which was Target Phone 8.

118. Following that stop, at 6:49 p.m. on July 1, 2007, (call 5355) was intercepted over Target Phone 8. In that call, TAVARIS WILLIAMS, using Target Phone 8, told AUKEY WILLIAMS, "Man them mother fuckers just had us stretched out at Sears man. The Dicks man...two cars deep. Like a mother fucker telling on this car or something G." AUKEY WILLIAMS then asked, "what happen, what...where you have the (unintelligible)." TAVARIS WILLIAMS stated, "man I had these mother fuckers under this mother fucking seat. I had to stash these hid it at the last minute." AUKEY WILLIAMS then asked, "man

you all be hittin' mother fuckers on the other side of...that's because you all on the other side of the viaduct G." TAVARIS WILLIAMS stated, "hell yeah." AUKEY WILLIAMS stated, "that's what it is. Somebody called in and reported it what car you all was in. You all in the big blue car man."

119. In summary, in this call, TAVARIS WILLIAMS was telling AUKEY WILLIAMS about the traffic stop which had just occurred. AUKEY WILLIAMS then asked TAVARIS WILLIAMS what happened to the supply of heroin ("where you have the [unintelligible]"). TAVARIS WILLIAMS then explained that he had the heroin hidden under the seat to conceal it from law enforcement ("man I had these mother fuckers under this mother fucking seat.") AUKEY WILLIAMS then asked TAVARIS WILLIAMS where he had been selling heroin (man you all be hittin' mother fuckers on the other side of ...that's because you all on the other side of the viaduct G"). TAVARIS answered that he had been selling in that area ("hell yeah") believed to be at 79th Street and Anthony Street, near the viaduct ("On the other side of the viaduct").

120. For example on May 4, 2007 at 10:44 a.m. (call 11246) MAURICE WILLIAMS, using Target Phone 4, called LARRY JOHNSON²¹ and asked, "What's good

²¹ The identification of LARRY JOHNSON is based on the following: On numerous calls intercepted over target phones in this investigation, an individual is identified by name as "LARO." Based on the consistency of the voice referred to as "LARO" on the intercepted calls, officers and agents developed a preliminary voice identification for "LARO." On August 5, 2007 CPD Officer Tony Rotkovich stopped LARRY JOHNSON for drinking on the public way. During this stop, JOHNSON provided identification bearing his photograph and his name. JOHNSON was then briefly detained and interviewed. Following this interview, Officer Rotkovich listened to calls 13 and 480, intercepted over Target Phone 5 and identified LARRY JOHNSON'S voice.

boy?” JOHNSON answered, “Reese man I’m in the hundreds man. I’m dead. I’m on my way out there. Uh, you have some extra for me?” WILLIAMS stated, “Shit. No. Call the uh...call the Rio’ phone.” In summary, in this call MAURICE WILLIAMS asked JOHNSON how his heroin sales were going. JOHNSON answered by telling MAURICE WILLIAMS where he was at (“man I’m in the hundreds”) meaning that he was on the south side of Chicago, south of 100th Street. JOHNSON also explained to MAURICE WILLIAMS that he was currently out of heroin (“I’m dead”) and asked MAURICE WILLIAMS if he had any heroin that he could get from him (“you have some extra for me?”). MAURICE WILLIAMS told JOHNSON that he did not have any heroin for him but to call MARIO REEVES (“Rio”) phone to get re-supplied (“No. Call the uh...call the Rio’ phone.”).

121. On May 7, 2007, at 1:26 p.m., (call 24776), JOHNSON called JONTALLE BOOKER, who was using Target Phone 4, and asked, “Hey boy, you ain’t talk to Reese for me?” BOOKER answered, “They, uh, ass on Engleside what’s good? You out?” JOHNSON stated, “Hell yeah.” JOHNSON asked, “Hold on...You gonna talk to Aukey now?” BOOKER answered, “Uh huh. They all take they ass on Engleside. I’m finnin’ to ride down on ‘em.” In summary, in this call JOHNSON asked BOOKER if BOOKER had talked to MAURICE WILLIAMS (“Reese”) about supplying JOHNSON more heroin for JOHNSON to sell (“you ain’t talk to Reese for me?”). BOOKER asked JOHNSON if JOHNSON was out of heroin (“You out?”) and JOHNSON confirmed he was. JOHNSON asked BOOKER if he was going to talk to AUKEY WILLIAMS (“Aukey”), and BOOKER

stated that we was (“Uh huh. They all take they ass on Engleside. I’m finnin’ to ride down on ‘em.”).

122. On May 8, 2007 at 7:46 p.m., (call 27612), JOHNSON called BOOKER, who was using Target Phone 4, and stated, “Hey, kid, I need to come get up some shit.” BOOKER answered, “Aww shit...meet me on uhh...on Avalon Laro.” In summary, in this call, JOHNSON called BOOKER to get more heroin from BOOKER from JOHNSON to sell (“I need to come get up some shit.”) BOOKER agreed to meet JOHNSON on Avalon Street (“meet me on uhh...on Avalon Laro).

123. On May 8, 2007 at approximately 7:46 a.m., (call 480), MAURICE WILLIAMS, using Target Phone 5, spoke with JOHNSON regarding how much heroin they had sold on that shift. MAURICE WILLIAMS asked “How much you do?” JOHNSON responded “Shit like damn near 34, 35.” MAURICE WILLIAMS said “We took 20 from you, we took care and we started off 10.” JOHNSON stated “Dude you started off with 50s dude you had me all took 20 off the 30 B.” MAURICE WILLIAMS asked “How much money you got on you?” JOHNSON stated, “ I’m fittin’ to count the money and call you right back.”

124. In summary, MAURICE WILLIAMS wanted to know how much heroin JOHNSON had sold (“How much you do?”) and JOHNSON told him 34 or 35, meaning 34 or 35 individual bags containing a user quantity of heroin. MAURICE WILLIAMS and JOHNSON then disputed about how much of the bundle – which contains 50 bags – had been given to JOHNSON (“We took 20 from you, we took care and we started off 10.”

JOHNSON stated “Dude you started off with 50s dude you had me all took 20 off the 30 B.”). They decided to figure out the answer by having JOHNSON count the proceeds from his sales (“How much money you got on you?” JOHNSON stated, “I’m fittin’ to count the money and call you right back.”)

E. Re-Supplying the Main Worker.

125. The following is an example of AUKEY WILLIAMS directing workers where to obtain additional bags of heroin to sell to Poison Line customers. On May 23, 2007, AUKEY WILLIAMS had a conversation with MARIO REEVES and MAURICE WILLIAMS, (call 15047), on Target Phone 4. MARIO REEVES said, “Hey dude Pete wants 55, I need a bundle.”²² AUKEY WILLIAMS asked, “What you say?” MARIO REEVES repeated, “Dude Pete wants 55, I need a bundle.” AUKEY WILLIAMS said, “Let me talk to Reese.” MAURICE WILLIAMS then got on the phone and said, “Hello.” AUKEY WILLIAMS said, “Yeah it’s in the back over there. It’s a black . . . [unintelligible].” MAURICE WILLIAMS said, “In the garage.” AUKEY WILLIAMS countered, “No, no, no, no, no.” MAURICE WILLIAMS said, “Awright, awright, awright, awright.” AUKEY WILLIAMS said, “But ahh...look, look, it, it’s, uhh.... nineteen, it’s nineteen hundred but it ain’t, ain’t it ain’t separate, it’s all one joint.” MAURICE WILLIAMS said, “So I got to count them out?” AUKEY WILLIAMS, “Yep.” MAURICE WILLIAMS answered, “Aww, wow right.”

²² See UCO purchase of narcotics on May 23, 2007, at paragraph 52 above.

126. In summary, during this conversation between AUKEY WILLIAMS, MARIO REEVES and MAURICE WILLIAMS, AUKEY WILLIAMS was directing MAURICE and MARIO where to find a bundle of 1,900 bags of heroin in order for them to retrieve 55 and sell them to a customer.

127. On May 6, 2007 at approximately 8:57a.m., JONTALLE BOOKER had a conversation, (call 19035), with an unknown male("UM"). BOOKER said, "Hello," and the UM replied, "Hey this is White Boy...I'm out front in the front entrance." BOOKER directed, "Come to me.. Oh uh ring the third bell White Boy." The UM asked, "At the bottom or the top?" BOOKER answered, "From the top." The UM said, "Alright." In summary, in this call BOOKER instructed a customer where to meet BOOKER in order for BOOKER to sell him heroin.

128. Under two hours later, on May 6, 2007, at approximately 10:38 a.m., MAURICE WILLIAMS had a conversation (Call 19393) on Target Phone 4 with JONTALLE BOOKER. MAURICE WILLIAMS said, "You out?" BOOKER responded, "Hell yea I need to come get a bundle." MAURICE WILLIAMS replied, "I'm fittin to let you know where it is right now. Hey, it's in the Avalon ...alley you know right there where the hole in the garage at." BOOKER replied, "Shit." MAURICE WILLIAMS said, "No, no. no listen I moved it." BOOKER disagreed saying, "I was just back there." MAURICE WILLIAMS reiterated, "Listen I moved it. You know where, you know where the hole is ...where you put it where we used to stick our hand there, right? In the garage in the little hole?" BOOKER said, "Yeah." MAURICE WILLIAMS said, "What you know finna little

boat right there now.” BOOKER said, “Yea.” MAURICE WILLIAMS said “Before the garage look before you got to the hole ther’s gonna be a black bag.It’s sit...it’s sittin out. I threw just there by the dirt, ya know what I’m saying?” BOOKER asked, “Yea how many in there?” MAURICE WILLIAMS answered, “Seventy.” In summary MAURICE is directing BOOKER as to where he can find a black bag containing seventy individual bags of heroin in order for BOOKER to replenish his supply of heroin and continue selling.

129. On May 27, 2007 MARIO REEVES had a conversation with JONTALLE BOOKER, (call 25756), on Target Phone 4, in which REEVES said, “Where yo at B?” BOOKER replied, “Shit I’m just walking out on Vernon.” REEVES said, “Take Petey 25 bags.” BOOKER asked, “Petey?” REEVES responded, “Take him 25 bags on Maryland.” In summary, REEVES directed BOOKER to re-supply Individual C (a Poison Line worker) with 25 bags of heroin.

130. On May 27, 2007 MARIO REEVES had a conversation, (call 28583) with JONTALLE BOOKER on Target Phone 4, in which REEVES asked, “Where you at B.” BOOKER said, “Sittin on Eberhart meeting somebody near the alley right here.” REEVES said, “Man, bring [a nickname for Individual A] 25 bags right quick, hurry up.” BOOKER asked, “Right now?” REEVES responded, “Yeah speak with ol’ boy.” BOOKER said, “Alright.” In summary REEVES in the above call is directing BOOKER to re-supply Individual A with 25 bags of heroin.

131. On May 3, 2007, at approximately 3:03 p.m., JONTALLE BOOKER had a conversation, (call 8029), on Target Phone 4 with an unknown male(“UM”). The UM said,

“Yo where you at man I’m coming to you.” BOOKER responded, “I’m finna to pull up on you Yukon, we right there on uh...,where you at right now?” UM answered, “In front of the crib.” BOOKER said, “Oh T, I’m grabbin the shit right now, I’m on 79th and Rhodes.” UM responded, “Alright meet me, meet me down at bout at one o’clock.” BOOKER said, “Yeah meet me at the same little parking lot.” UM agreed, “Alright.” BOOKER asked, “How many you need ready?” UM replied, “Bout 5 or 6.” BOOKER said, “Alright.” In summary, BOOKER informed an unknown male that he is currently obtaining more heroin and that BOOKER would meet the customer immediately afterward. The UM informed BOOKER that he would like to purchase 5 or 6 bags of heroin and BOOKER agreed to supply that amount.

F. Collecting Proceeds of Poison Line Heroin Sales from Workers.

132. MAURICE WILLIAMS and MARIO REEVES are two individuals AUKEY WILLIAMS used to assist him with the daily operations of the Poison Line. On occasion AUKEY WILLIAMS would direct MAURICE WILLIAMS and MARIO REEVES to check on the workers to ensure they were working and returning the proceeds of the sales. For example, on May 14, 2007, at approximately 2:22 p.m., JONTALLE BOOKER, using Target Phone 4, received a call, (call 50991), from MARIO REEVES who stated “Where you at?” BOOKER answered, “On Vernon.” REEVES then asked BOOKER, “You out?” BOOKER then answered, “Hell yeah. I was drivin with money cause I just had...I wasn’t ridin’ around with all that money boy.” REEVES then asked BOOKER, “shit...how much is it?” BOOKER then answered, “shit...it’s like ...twelves...standard twelves. Probably like twelve

fifty.” REEVES then told BOOKER, “alright, come on...uh...come on, come on 55th and King Drive in that Citgo Gas Station.

133. In summary REEVES asked BOOKER if he has any more heroin in his possession to sell. BOOKER stated that he had sold all of the heroin he had and was now driving around with the profit from the sales. BOOKER told REEVES that he had \$1250 in currency from the heroin sales. REEVES instructed BOOKER to meet him in the gas station at 55th Street and King Drive so REEVES could collect the currency from BOOKER.

134. On May 11, 2007, AUKEY WILLIAMS had a conversation, (call 60), on Target Phone 4 indicating he was going to meet JONTALLE BOOKER to pick up some money. AUKEY WILLIAMS asked, “What’s the deal?” BOOKER responded, “What’s up dog?” AUKEY WILLIAMS, “What’s it looking like?” BOOKER said , “Cus I’m working on this other 50 right now... where you at?...to grab some money.” AUKEY WILLIAMS answered, “Shit...I’ll be around in a few seconds.” BOOKER said, “Alright.” In summary, BOOKER explained to AUKEY WILLIAMS that he is selling a bundle containing 50 bags of heroin and would like to meet AUKEY WILLIAMS to give him the money from the sales.

135. On May 14, 2007 AUKEY WILLIAMS had a conversation, (call 0), at approximately 5:46 p.m., on Target Phone 6 with MARIO REEVES in which REEVES asked, “Why didn’t you wait till we settle everything?” AUKEY WILLIAMS said, “Shit I was ...get the shit out of the way right quick.” REEVES responded, “You grab the money?” AUKEY WILLIAMS answered, “I’m fittin to go down there right now.” REEVES said, “Gas money use (unintelligible) like three singles.” AUKEY WILLIAMS said, “Awwright.”

REEVES explained, “And um it really it’s(unintelligible) even 1200 cus I had gave [F] 20 dollars for gas cus I took 20.” In summary MARIO REEVES informed AUKEY WILLIAMS in the above call that there is about \$1200 in proceeds ready for AUKEY WILLIAMS to pick up, minus some gas money and \$20 given to “[F],” meaning Individual F.

136. On May 16, 2007 at approximately 7:44 p.m., (call 163), a call was intercepted on Target Phone 5 in which AUKEY WILLIAMS and MARIO REEVES discuss how much money the sellers have turned into REEVES. During this call, AUKEY WILLIAMS stated, “I think Jontalle just said it was 660 he just gave.” REEVES responded, “And what did Laro, he just called up here.” AUKEY WILLIAMS replied “LARO gave 470.” In summary, AUKEY WILLIAMS reported to REEVES that BOOKER and LARRY JOHNSON had just given AUKEY WILLIAMS proceeds from narcotics sales which amounted to approximately \$1130.

137. On May 18, 2007, AUKEY WILLIAMS had a conversation, (call 65345), on Target Phone 4 with JONTALLE BOOKER. AUKEY WILLIAMS said, “So all together how many bags you did today?” BOOKER replied, “Me?” AUKEY WILLIAMS said, “Yea.” BOOKER responded, “I had two Gs and did 1500.” AUKEY WILLIAMS asked, “And now you are working on the last one?” BOOKER said, “Yep” AUKEY WILLIAMS asked, “What you got left now?” BOOKER responded, “ About 30 no 35.” AUKEY WILLIAMS asked, “The phone ain’t ringing no more?” BOOKER said, “ Not really.” AUKEY WILLIAMS asked, “What they saying is it weak or what?” BOOKER answered,

“I got some motherfuckers saying it’s weak, it’s glue. Man I had one mother fucker say it burned his nose. I don’t know what the fuck is going on. I’m talking bout a lot of motherfuckers (unitelligible).” AUKEY WILLIAMS said, “They calling you back after you tell them it’s different not the same shit.” BOOKER responded, “Some do [unintelligible] then they call say it ain’t what it suppose to be.” WILLIAMS said, “We should be back in business here cause I’m finna to call in a minute.” BOOKER responded, “ Alright.”

138. In summary BOOKER told WILLIAMS he had \$2,000 worth of heroin (“2 Gs”) sold three packs containing fifty bags each for \$500 a pack totaling \$1500. BOOKER stated that he was working on the last fifty pack, having about 30-35 left. BOOKER reported that the work phone is not ringing anymore and that some customers reported that the heroin was weak and one reported that the heroin burned his nose.

139. On May 14, 2007 (call 29) a call was intercepted on Target Phone 6 between MARIO REEVES and AUKEY WILLIAMS. AUKEY WILLIAMS stated “there was 100 left to do in the cup then?” REEVES stated “Dude owe 400, LARO owe 5, there’s 5 and the rest is up in the cup.” In summary, MARIO REEVES told AUKEY WILLIAMS that one worker owed \$400 in proceeds, LARRY JOHNSON (“LARO”) owed \$500, and then identified how much heroin is left to be sold.

140. The following is an example of MARIO REEVES chastising a worker for coming up short on the money from sales of heroin for that shift. On May 12, 2007, MARIO REEVES had a conversation, (call 46092) with JONTALLE BOOKER on Target Phone 4, in which REEVES asked, “How is this nine-fifty B?” BOOKER responded, “Off

the two bundles.” REEVES confirmed, “Right.” BOOKER said, “It’s suppose to be a mother fuckin...hold on...[sounds similar to money being counted].....hello.” REEVES said, “It’s suppose to be a G, but it’s nine-fifty.” BOOKER responded, “B those bags was short and then I had bundles got damn it with bags that was slit and everything.” REEVES demanded, “You say what?” BOOKER said, “I had some bags got damnit that wasn’t even, that was empty and everything. Motherfucker had bags that were cut and everything.” REEVES asked, “So you telling me you had fifty dollars of bags that was cut?” BOOKER said, “Nah I got some gas too boy.” REEVES said, “Folks so you just, I’ll then spent two hundred and fifty dollars worth of gas?” BOOKER said, “Hell nah.” REEVES complained, “You ain’t brought no money back G, everything been short.....Every bundle you bring back is four-fifty and you talking about gas.” BOOKER replied, “Folks I ain’t touched shit.”

141. In summary REEVES was asking why BOOKER is routinely short on money from the sales of heroin on the Poison Line and BOOKER was trying to explain why he kept coming up short. REEVES stated BOOKER was supposed to give back \$1,000 (“G”) and instead returned only \$950. BOOKER claimed that some bags were cut and had no heroin so he could not sell them. REEVES doubted this explanation and BOOKER shifted to claiming that he spent money on gas. BOOKER claimed he had not stolen any of the proceeds for himself.

142. On May 14, 2007 at 2:32 p.m., (call 51023), Individual F called JONTALLE BOOKER, who was using Target Phone 4 and asked BOOKER, “Yeah where you at now?” BOOKER answered, “Who’s this?” Individual F replied, “I’m sayin’ man listen, man, Rio

sendin' me up here man to the gas station player." MARIO REEVES then spoke to BOOKER on the phone and BOOKER said to REEVES, "Man I swear to God I was just treatin' him like a customer, who was that bro'?" REEVES answered, "One of the guys, where you at B?" BOOKER said, "I'm bogus as hell...man I'm on seventy-fifth boy I'm on my way there now to grab the money, what you want me to give him the brick?" REEVES answered, "Ya man."

143. In summary, in this call Individual F, who was being directed by REEVES, is talking to BOOKER to coordinate collection of profits from heroin sales. It appears that after BOOKER has collected the money from an unknown location, he will meet with Individual F to drop off the money ("brick"). BOOKER at first did not recognize Individual F's voice but was assured by REEVES that Individual F is a Poison Line worker ("one of the guys").

144. On July 1, 2007 at 5:15 p.m., AUKEY WILLIAMS called TAVARIS WILLIAMS, (call 5165), who was using Target Phone 8, and asked, "You got one out of that one that I put in the stash? For you." TAVARIS WILLIAMS answered, "Yeah." AUKEY WILLIAMS then asked, "So you got money for two then right?" TAVARIS WILLIAMS stated, "Yeah." AUKEY WILLIAMS asked, "Oh, alright. Where you at?" TAVARIS WILLIAMS stated, "I'm right here on um...what's this...over here on 79th and Kimbark." AUKEY WILLIAMS stated, "alright, we finna pull up on you all right there. Just stay right there. Pull over."

145. In summary, in this call AUKEY WILLIAMS asked TAVARIS WILLIAMS if he had gotten a bundle of heroin from the stash location ("you got one out of that one that

I put in the stash?"). AUKEY WILLIAMS then asked TAVARIS WILLIAMS if TAVARIS had \$1,000 in proceeds from narcotics sales ("So you got money for two then right?"), and TAVARIS confirmed he had the money. AUKEY WILLIAMS then told TAVARIS WILLIAMS to stay where he was so that AUKEY WILLIAMS could collect the profit from the heroin sales from TAVARIS WILLIAMS.

G. Quality Control

146. The following calls are examples of AUKEY WILLIAMS checking on the quality of the heroin sold on the Poison Line. On May 15, 2007, AUKEY WILLIAMS had a conversation, (call 207), on Target Phone 4 with JONTALLE BOOKER. AUKEY WILLIAMS asked, "Have motherfuckers call you back and tell you what they think about that?" BOOKER replied, "Huh?" and AUKEY WILLIAMS repeated, "I'm saying you serve somebody just have them call you back and tell you what they think about that." BOOKER, "Alright." In summary, AUKEY WILLIAMS directed BOOKER to instruct the next customer that BOOKER served to call BOOKER back and tell BOOKER what the customer thought about the quality of the heroin.

147. On May 18, 2007 AUKEY WILLIAMS had a conversation (call 849) on Target Phone 5 with an unknown female ("UF"). During the call, the UF said "it's alright" referring to the quality of the heroin. AUKEY WILLIAMS asked, "It's, it's, it's, what it on a scale from 1-10." The UF asked, "Huh?" WILLIAMS repeated, "1-10," and the UF replied, "10...it's good." In summary, AUKEY WILLIAMS asked a customer to rate the quality of the heroin, which the customer thought was a "10."

148. On May 16, 2007 at 10:11 a.m., (call 13), LARRY JOHNSON called AUKEY WILLIAMS, who was using TARGET PHONE 5, and AUKEY WILLIAMS stated, “Ay boy. Motherfucker dead but shit God damn it a lot of that shit got wet brother. A lot of heads came back sayin’ that shit was wet. That shit was kind of wet man.” LARRY JOHNSON asked, “What the fuck ya’ll do?” AUKEY WILLIAMS answered, “Man. I don’t know what the fuck this old man did. Man I don’t know how the fuck he went inside of the can, he must have not tightened God damn it the bottom of the can all the way.”

149. In summary, in this call AUKEY WILLIAMS was explaining to LARRY JOHNSON that a supply of the heroin got wet and had affected the quality of the heroin (“a lot of that shit got wet brother”) and that customers (“heads”) were complaining about the quality (“a lot of heads came back sayin’ that shit was wet.”). AUKEY WILLIAMS then told JOHNSON that an unknown male, who prepared the heroin for distribution, must not have sealed the container after it was prepared and moisture got into the container thus affecting the quality of the heroin (“Man. I don’t know what the fuck this old man did. Man I don’t know how the fuck he went inside of the can, he must have no tightened God damn it the bottom of the can all the way.”)

H. Counter-surveillance

150. The following call is an example of AUKEY WILLIAMS directing a worker to avoid police surveillance. A few minutes before this call, a CPD officer in an undercover

vehicle had established surveillance near 4720 South King Drive in Chicago.²³ On May 5, 2007, AUKEY WILLIAMS had a conversation, (call 10454), with JONTALLE BOOKER on Target Phone 4. AUKEY WILLIAMS said, “Where you at B?” BOOKER replied, “Round, finnin to turn down the alley right now.” AUKEY WILLIAMS said, “Alright do this just do this.” BOOKER said, “Huh?” AUKEY WILLIAMS said, “Listen to me. Just listen to me right quick.” BOOKER replied, “OK.” AUKEY WILLIAMS said, “Stop in the alley, right?” BOOKER said, “Yea.” AUKEY WILLIAMS asked, “You ain’t got nothing on you right?” BOOKER answered, “Nope.” AUKEY WILLIAMS said, “You act like you’re fttin to go off. Dude watching you. Dude watching you already B.” BOOKER responded, “Yea.” AUKEY WILLIAMS directed, “Hold on hold on just stay on the phone B. Just stop in the alley and sit there for a second. Just stop in the alley and sit there for a second.” BOOKER replied, “OK.” AUKEY WILLIAMS said, “I’m fittin to pull over and get out right quick. I’m fittin to tell you how to do this.” BOOKER responded, “OK what we wanna do?” AUKEY WILLIAMS asked, “You ain’t got nothing on you right?” BOOKER replied, “ I ain’t got shit but one hundred and ten dollars bah.” AUKEY WILLIAMS said, “OK that’s cool dis what you do. Stop in the alley B.” BOOKER said, “Yea.” AUKEY WILLIAMS stated, “Act like you are fittin to pick something up ...you know what I’m saying? Just wait till you get off the phone with me. Act like you are picking something up. See the mark sitting in the right there not by the front of the building but he

²³ Based on information from, Accurint, a public database which records property transactions, on January 29 2007, AUKEY WILLIAMS purchased a condominium at this location.

sitting where he could see the back of the building, but he sitting where he can see the back of the building you feel me?” BOOKER answered, “Right.” AUKEY WILLIAMS said, “Just stop right there se he already see you anyway. Stop right there.” BOOKER said, “Yea.” AUKEY WILLIAMS again directed, “Act like you fittin to pick something up.” BOOKER said, “Is was right by the alley.” AUKEY WILLIAMS said, “He, yea, we need him to get on you to get Rio out of there.” BOOKER said, “OK chief alright” AUKEY WILLIAMS said, “Let the mark get behind you. Let him follow you around, drive the nigger away.”

151. In summary AUKEY WILLIAMS instructed JONTALLE BOOKER to draw police surveillance (“the mark”) away from a condominium owned by AUKEY WILLIAMS and used by him as a “stash house” to store Poison Line heroin prior to distribution. AUKEY WILLIAMS wanted to draw away the police presence in order to allow MARIO REEVES (“Rio”) to leave the location undetected.

152. On July 13, 2007 at 8:26 p.m., (call 16323), DOMINIQUE WHITE called MAURICE WILLIAMS, who was using Target Phone 8. During that call WHITE asked, “So you ain’t see that um car pull out right behind you?” MAURICE WILLIAMS answered, “Regal?” WHITE stated “I swear to God, right after you pulled off, he pulled off.”

153. In summary, in this call, WHITE was alerting MAURICE WILLIAMS to police surveillance that was following him during this investigation. Immediately before and during this call, a CPD officer was conducting surveillance on WILLIAMS and was driving a Buick Regal, which WILLIAMS referred to as a “Regal.”

154. On May 18, 2007, at 1:56 p.m., (call 728), WHITE called MAURICE WILLIAMS, who was using Target Phone 5, after CPD officers entered her house looking for “Jameel” who fled from them. During this call MAURICE WILLIAMS asked WHITE, “I ain’t got no shit there though... [Individual D] came and got that seven, right?” WHITE responded, “mmm, mmm [affirmatively].” Later in the conversation, WHITE told MAURICE WILLIAMS, “I’m real mad because well I’m mad because what if your stuff was up there?”

155. In summary, in this call, MAURICE WILLIAMS asked WHITE to confirm that Individual D had removed seven bags, or grams, of heroin (“seven”) hidden within her residence. WHITE confirmed that the “seven” had been removed (“mmm, mmm”) but was angry that she may have been held responsible for MAURICE WILLIAMS’s heroin (“stuff”) had it been present and been found by police.

I. Paying Workers.

156. On July 3, 2007, AUKEY WILLIAMS had a conversation, (call 7792), with an unknown male worker (“UMW”) on Target Phone 8. The UMW said, “Man mutherfucker work all day man didn’t get nothing man I gotta a [unintelligible] that hurted me man, I would have gave you at least 200 dollars man.” AUKEY WILLIAMS replied, “Man now you complain and crap all day like a broad man.” The UMW said, “Cus I work 5 hours dog what am I suppose to do man I gotta family to feed.” AUKEY WILLIAMS said, “Man I’m not trying to hear that shit, all of us got a family to feed.” The UMW said, “Like you do I know that man. That’s what I’m saying I would have gave you something man.” AUKEY

WILLIAMS responded, “Man what about all the days I paid you when you didn’t do nothing though?” The UMW answered, “Awe you (unintelligible) I came over you and gave you my work man I (unintelligible).” AUKEY WILLIAMS stated, “Man I called you ass over on Ingleside first thing in the morning.” The UMW said, “No you called me on Woodlawn, I was buying a pack of squares and was trying to get something to eat man you seen me on Woodlawn over there [unintelligible] a pack of squares and [unintelligible] over here man.” AUKEY WILLIAMS answered, “Awright awright, awright, awright OK OK....Hello? I’ll see y’all in a minute man.” In summary, the UMW wanted to be paid for the five hours he worked selling heroin for AUKEY WILLIAMS and AUKEY WILLIAMS was reluctant to pay him.

J. NICOLE BOZEMAN Arranged for Rental Cars from Car Rental Company A to be Used by Defendants.

157. NICOLE BOZEMAN supplied AUKEY WILLIAMS, and others working for AUKEY WILLIAMS, with rental vehicles to be used to sell Poison Line heroin. During at least a portion of the time relevant to the complaint, BOZEMAN was an employee of Car Rental Company A and supplied AUKEY WILLIAMS and his workers with vehicles for the Poison Line by using rental contracts which, on at least one occasion, was made out in her name, and knowing the vehicles were not to be used by her, but instead would be used to conduct drug sales on the “Poison” heroin line.

158. The following are examples of calls in which NICOLE BOZEMAN informed certain defendants that a rental vehicle is available. On July 7, 2007 at approximately 7:20

a.m., surveillance observed AUKEY WILLIAMS park a Mazda Scion licence plate of G355593 (registered to Car Rental Company A) and enter the residence of 7442 South Wentworth. Shortly after that a call, (call 10479), was intercepted over Target Phone 8 during which AUKEY WILLIAMS informed MAURICE WILLIAMS the police were watching AUKEY WILLIAMS. AUKEY WILLIAMS said, “The Intrepid following again B. Man the mark, I’m on the porch ringing the bell, the mark come pass B. I look at the mark (unintelligible) shit all the up (unintelligible) they lookin (unintelligible) at me. I was damn(unintelligible) I came straight off the porch dude, (unintelligible) parked in that lot over there, by black nigga house.” MAURICE WILLIAMS said, “Yeah.” AUKEY WILLIAMS continued, “I caught themselves watching me B. Well, I sit and chill for a minute though I left, (unintelligible) I shook them off. I’m standing in the back, in the alley, in the bushes, where you at?” In summary, AUKEY WILLIAMS advised MAURICE WILLIAMS that AUKEY had seen police surveillance (“mark”) watching AUKEY WILLIAMS. AUKEY stated that he was hiding in the bushes, rather than getting back in the vehicle which AUKEY had driven to that location.

159. Later that morning, on July 7, 2007, at 10:11 a.m., BOZEMAN had a conversation (call 10603) with MAURICE WILLIAMS on Target Phone 8. MAURICE WILLIAMS said, “This Reese.” BOZEMAN said, “ Hey Reese, tell, tell, Key to uh call Rental Service and make a reservation cuz they’ll pull it today talkin bout there ain’t no walk up.” MAURICE WILLIAMS responded, “OK.” BOZEMAN said, “Tell him to make a

reservation and make sure he get the confirmation number so he will have it when he get it to me.” MAURICE WILLIAMS replied, “Alright let me talk to VINCE [GATHINGS].”

160. In summary, BOZEMAN told MAURICE WILLIAMS to tell AUKEY WILLIAMS call Car Rental Company A to obtain a new rental car for AUKEY WILLIAMS over the phone. BOZEMAN directed MAURICE WILLIAMS to tell AUKEY to get the confirmation number so she would know which car AUKEY had reserved.

161. On July 7, 2007, at approximately 2:54 p.m., BOZEMAN had a conversation, (call 10928), with VINCE GATHINGS on Target Phone 8. GATHINGS said, “Yea. Who this?” BOZEMAN responded, “Me!” GATHINGS asked, “Oh what’s happening?” BOZEMAN replied, “Nothing, I just called to tell you I made it to White uh tell...Key and them it’s a Ford Explorer here.” GATHINGS answered, “OK.” BOZEMAN said, “ And but they gonna have to, it ain’t got no navigational system in it, they gonna have to get the um...that(unintelligible) on it... for ten dollars a day.” GATHINGS, “OK you saying the navigational system is ten dollars a day?” BOZEMAN answered, “Yea.” GATHINGS responded, “OK.” BOZEMAN said, “I just tried to call the 410 number but it ain’t going through... I don’t know what’s wrong.” GATHINGS answered, “Oh, OK alright.” BOZEMAN stated, “But uh tell him to call me... well I’m gonna call back and give you the number over there where I’m gonna be at so they could call me.” GATHINGS said, “Alright.” In summary, BOZEMAN told GATHINGS to inform AUKEY WILLIAMS that she had a Ford Explorer for AUKEY WILLIAMS to rent from Car Rental Company A.

K. Competition with other Heroin Sellers

162. On May 16, 2007, at 1:08 p.m., (call 65), DOMINIQUE WHITE called AUKEY WILLIAMS who was using Target Phone 5 and asked, "Where Reese at?" AUKEY WILLIAMS advised that MAURICE WILLIAMS was not available. WHITE then stated, "stop playin' wit' me, I plan on tellin' you something important." WHITE then spoke to MAURICE WILLIAMS saying, "You know, you know (unintelligible) and them got the same shit ya'll got....huh?" MAURICE WILLIAMS asked, "What you talkin' about?" WHITE stated, "What I'm talkin' bout?...what you do" MAURICE WILLIAMS asked, "The matter...what you mean they got the same shit we got?" WHITE responded, "Whatcha do" MAURICE WILLIAMS asked, "Oh yeah?" and then said, "Where?" WHITE answered, "I don't know, I was walking down the lane....and I seen them talkin' I mean I seen them wit' some of the uh ...hypes." MAURICE WILLIAMS then asked, "Hoppin' 'em in the car?" WHITE answered, "Yea." MAURICE WILLIAMS said, "Thanks for lettin' me know."

163. In summary, in this call, WHITE informed MAURICE WILLIAMS that other individuals were selling ("hoppin' 'em in the car") heroin ("and them got the same shit ya'll got") in the vicinity of where the Poison Line usually operates.

L. Additional Calls Between TOM BROWN and AUKEY WILLIAMS

164. On May 16, 2007 at 10:04 a.m., (call 10), AUKEY WILLIAMS, using Target Phone 5, called TOMMIE BROWN and asked, "What that...how much of that you do yesterday?" BROWN asked, "You say what?" WILLIAMS stated, "How much of that you did yesterday?" BROWN answered, "Probably got about thirty, forty beans." WILLIAMS stated, "Aw so you did good huh?" BROWN asked, "Huh?" WILLIAMS stated, "I said you

did good huh?” BROWN stated, “If that’s what you want to call it.” WILLIAMS stated, “Shit you got thirty or forty. That mean you did about thirty.” In summary, WILLIAMS asked BROWN how much heroin BROWN had sold on the previous day (“how much of that you do yesterday?”) BROWN then told WILLIAMS he had sold thirty or forty bags of heroin.

165. On May 18, 2007 at 8:22 p.m., (call 857), AUKEY WILLIAMS, using Target Phone 5, called TOM BROWN and asked, “Where you at B?” BROWN stated, “Coming from my crib.” WILLIAMS asked, “Why don’t ya grab that quarter right quick while you over there.” BROWN stated, “Grab what?” WILLIAMS stated, “That, that last seven that’s over there.” BROWN stated, “Uh, I really had somebody this morning did.” I believe that in this call WILLIAMS is asking BROWN to bring him one quarter ounce (“quarter”) of heroin to be distributed by one of his “workers.” BROWN, not having understood WILLIAMS (“Grab what?”), was then told by WILLIAMS to bring the “seven” which is another reference to one quarter ounce of heroin (one ounce is 28.35 grams, and one quarter of an ounce is approximately 7 grams) (“That, that last seven that’s over there”).

M. Quantity of Heroin Sold During the Conspiracy

166. As detailed above, according to MAURICE WILLIAMS, he sold 90 bags per day to Poison Line customers, on a daily basis since January 2007.²⁴ Calls intercepted over

²⁴ Based on the quantities recovered on average from the bags purchased by UCOs in the controlled purchases set forth above, on average a single bag sold to a customer contains .2 gram of heroin. Thus MAURICE WILLIAMS was selling approximately 19 grams per day, which amounts to approximately 570 grams every 30 days, and 4,560 grams

Target Phones 4 and 8 during the investigation corroborate the information supplied by MAURICE WILLIAMS.²⁵

over the first eight months of 2007. Even assuming, that MAURICE WILLIAMS only worked five days per week, he alone would have sold 3,040 grams of heroin over the last 8 months.

²⁵ Review of calls intercepted over Target Phone 4 from May 1, 2007, through May 31, 2007, and calls intercepted over Target Phone 8 from June 25, 2007, through July 24, 2007, indicates that on average, the person using the Poison Line work phone arranges approximately 100 heroin orders every day. For example on May 1, 2007, there were a total of 365 pertinent calls intercepted over Target Phone 4. In 251 of the 365 intercepted calls, at least 43 different customers requested heroin. The orders placed in these calls totaled approximately 100 bags of heroin (excluding calls where the caller simply asked to meet the work phone worker and did not make a specific request for a bag or bags). In addition, the intercepted calls obviously do not reflect any sales made by workers on sight, without the aid of the work phone. For an example of an on-sight street sale, see paragraph 42 above. Even assuming that the Poison Line worker(s) only sold approximately 100 bags of heroin on May 1, 2007, that amounts to approximately 20 grams of heroin sold on that day alone. Calls intercepted over Target Phone 4 and Target Phone 8 demonstrate, that with rare exception (for example when the worker with the work phone was arrested or overslept) the work phone was in use almost every day to serve a large volume of customers. Assuming the Poison Line sold 20 grams per day over the work phone, sales from the work phone alone were approximately 600 grams every thirty days – which can be extrapolated to approximately 4,800 grams from January 2007, through August 2007.

CONCLUSION

WHEREFORE, Affiant submits that the foregoing evidence establishes that the named defendants conspired and agreed with each other and with others to knowingly possess with intent to distribute and distribute controlled substances, namely, in excess of 1 kilogram of heroin, in violation of Title 21, United States Code, Section 846, and did aid and abet said conspiracy, in violation of Title 18, United States Code, Section 2.

FURTHER AFFIANT SAYETH NOT.

Terrance Looney,
Chicago Police Officer, and
DEA Task Force Officer

Subscribed and sworn before me this
_____ day of September 2007

Honorable Maria Valdez
United States Magistrate Judge
Northern District of Illinois